



St. Luke's Development Corporation

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**Narrative Information Sheet
U.S. EPA Brownfield Cleanup Grant Application
St. Luke's Development Corporation**

1. Applicant Identification

St. Luke's Development Corporation
111 Whalley Avenue, New Haven CT 06511

2. Funding Requested

a. Grant Type

Multiple Site Cleanup

b. Federal Funds Requested

i. \$500,000

ii. Cost share waiver requested: Yes

3. Location

- a) New Haven
- b) New Haven County
- c) Connecticut

4. Property Information

- 1. 117-125 Whalley Avenue, New Haven CT, 06511
- 2. 129 Whalley Avenue, New Haven CT, 06511

5. Contacts

a. Project Director

Fred Taylor, Vice President
St. Luke's Development Corporation
111 Whalley Avenue, New Haven CT 06511
Phone (203)-764-0858
Fmt7909@gmail.com

b. Chief Executive/Highest Ranking Elected Official

Sam Andoh, President
St. Luke's Development Corporation
111 Whalley Avenue, New Haven CT 06511

Phone (203)-392-7179
Andohs1@southernct.edu

6. Population
Population of New Haven: 130,884 (American Community Survey, 2013-2017)

7. Other Factors Checklist

Other Factors	Page #
Community Population is 10,000 or less	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public throughfare separating them.)	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	Pg. 3

8. Letter from the State or Tribal Environmental Authority: Attached

October 8, 2020

Samuel K. Andoh Ph.D., President
St. Luke's Development Corporation
111 Whalley Ave
New Haven, CT 06511

Re: State Acknowledgement Letter for EPA Brownfields Cleanup Grant for FY 21

Dear Dr. Andoh:

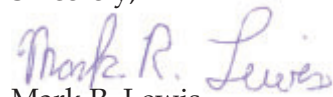
The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that St. Luke's Development Corporation intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2021. St. Luke's Development Corporation plans to use the grant funding to remediate properties contaminated with hazardous substances and petroleum located at 117-125 and 129 Whalley Avenue in New Haven, CT.

Cleanup work funded by an EPA grant must be performed in one of Connecticut's formal remediation programs, including among others the Voluntary Remediation Program pursuant to CGS § 22a-133x, the Property Transfer Program, (if applicable) pursuant to CGS §22a-134, the Urban Sites Remedial Action Program pursuant to CGS §22a-133m, or the Brownfields Remediation and Revitalization Program pursuant to CGS §32-769.

You may want to refer to DEEP's PREPARED Municipal Workbook. This on- line guidebook is designed to help municipalities navigate the complex process of remediating and redeveloping brownfields. The Workbook is available on DEEP's web site at <https://portal.ct.gov/DEEP/Remediation--Site-Clean-Up/Brownfields/PREPARED-Municipal-Workbook-Main-Page>.

If you have any questions about this letter, please contact me at (860) 424-3768 or by e-mail at mark.lewis@ct.gov. Good luck with your application.

Sincerely,



Mark R. Lewis
Brownfields Coordinator
Office of Constituent Affairs & Land Management

c: Ms. Dorrie Paar, EPA (via e- mail)
Dr. Nefeli Bompoti, UConn (via e- mail)

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i Background and Description of Target Area: Located in the southern part of Connecticut, the City of New Haven sits along the northern shore of the Long Island Sound. New Haven is the **second largest city** in the State and home to more than 130,000 people. Known as the **first “planned” city** in the US, New Haven was designed in a Nine Square Plan in the 1600s, where the center square was provisioned for common space. Nowadays, New Haven is an educational, healthcare, and cultural center and home to prominent institutes such as Yale University and the Yale New Haven Hospital. Since its incorporation in 1784, the City was mainly a thriving port and mercantile center, with the majority of the local economy focused on manufacturing. The invention of the cotton gin, Whitney’s gun manufacturing plant, and the Winchester Repeating Arms Company were a few of the major industrial activities present in the area. When the industrial sector declined in the mid-1900s, thousands were left unemployed resulting in a 25% drop in the population through the early 2000s.¹ Crime rates increased, and many businesses and families moved elsewhere. ***The decline resulted in the segregation of the “planned” city, with numerous abandoned commercial properties and factories.*** The majority of the industrial activities took place prior to the federal and state environmental regulations, which left many of the abandoned properties contaminated.

Our target area is located in the Whalley Avenue Corridor, a busy main street near the heart of New Haven which connects the downtown and west/northwest neighborhoods. The targeted sites, the Whalley Avenue properties, are located in the east segment of the 2-mile corridor, in close proximity to downtown New Haven, the Broadway retail district adjacent to Yale University, and New Haven Green. The targeted area is part of the Dixwell neighborhood located in northwest region of the downtown area, which is home to 5,240 people. The target properties are located next to St. Luke’s Episcopal Church, in a primary commercial area. ***Although the target area is centrally located, it is one of the most disadvantaged areas in New Haven. The target area census tracts contain some of the largest minorities and low-income populations in the State.***² With many former commercial and industrial properties, numerous brownfield sites are present in the target area. With the requested funds, we will help transform and revitalize the area that has been blighted for decades.

ii. Description of the Priority Brownfield Site: The targeted properties are located at **117-125 Whalley Avenue** (hereinafter “Site A”) and **129 Whalley Avenue** (hereinafter “Site B”), together (the “Sites”), two adjacent properties within a 2-mile radius from the Long Island Sound. The nearest downgradient surface water body, the West River, is within a 1-mile of the vicinity of the properties, which is used for potential drinking water supplies. Both properties were acquired by St. Luke’s Development Corporation (SLDC) in 2002, and currently have several tenants. The acreage of the Sites is 0.35 and 0.26 acres for 117-125 and 129 Whalley Avenue, respectively. Both Sites have existing buildings and asphalt parking, including a 10,000-square foot commercial building at 117-125 Whalley and a 3,900-square foot garage building at 129 Whalley Avenue. Located in downtown New Haven and within New Haven’s **Opportunity Zone**, the Sites have a prime potential for redevelopment. **Site A** was historically used as a residential property until 1929 when the residences were demolished for the development of an automotive service center. The property was occupied by various automotive service centers until 1995 when it was converted into multi-tenant commercial use. Currently there are a few tenants present but the majority of the property

¹ New Haven Vision 2025, City of New Haven (2015).

² EPA EJSCREEN

remains underutilized. Similar to Site A, **Site B** was occupied by a residence until the 1930s when it was converted to commercial use; it has hosted various auto sales and repair companies since the 1960s. Since the early 1990s, the property has been occupied by Aamity Car and Truck Rental which performs auto repairs. However, no hazardous waste has been generated by the last tenant and the contamination is from pre-existing uses.

Several Environmental Site Assessments (ESA) were performed at the Sites in the past years. A **Phase I ESA** was conducted in May 2016 and identified four potential Areas of Concern (AOCs) at Site A, including building interiors historically used for automotive repair, historical underground storage tanks (USTs) in the parking lot, suspected trench drain, and potential site-wide fill contamination. Five potential AOCs were identified at Site B and were associated with the in-ground hydraulic lifts, floor drain by lifts, oil storage, overhead doors, and potential site-wide fill. A subsequent **Phase II ESA and Supplemental ESA** included the advancement of 19 soil borings and the installation of 3 groundwater monitoring wells that confirmed the releases of several contaminants of concern (COCs) in the **AOCs including extractable total petroleum hydrocarbons (ETPH), volatile organic compounds (VOCs), heavy metals such as RCRA 8 metals, and polycyclic aromatic hydrocarbons (PAHs)**. The contamination is limited to soils while the groundwater is not currently contaminated. A **Hazardous Building Assessment** conducted in 2018 confirmed the presences of asbestos and lead-based paint in the interior of the buildings. Recently, a preliminary **Remedial Action Plan** suggested soil remediation in the soils around the in ground hydraulic lifts in Site B due to ETPH concentrations exceeding criteria, and the presence of arsenic and PAH in the soils of both sites.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: **The redevelopment plans for the Sites include a mixed-use development with affordable housing and commercial uses.** SLDC has outlined specific redevelopment plans for the properties and has acquired the professional preliminary designs of Paul Bailey Architect. The plans outline the design of a new 5-story L-shaped building on 117-125 Whalley Avenue with 44 residential units in total, including studios, one-bedroom apartments, and two-bedroom apartments. A 2,800 square foot interior courtyard will face St. Luke's Episcopal Church, while an additional 2,700 square feet of common space will also be available for residents. The lower floor will host 2,800 square feet of commercial space including parking space for commercial use. The redevelopment plan for both sites is part of a broader redevelopment plan of the block and the area. Several adjacent properties are included in SLDC's redevelopment plans. 10-12 Dickerman Street and 34-36 Sperry Street will host an additional 4-story building with 24 affordable housing residences. SLDC envisions creating an affordable living community around the church, with access to necessities like walkable groceries, other commercial stores located underneath the proposed residential units, and access to green space.

The revitalization of Whalley Avenue Corridor culminates the City's, and other stakeholders', 20-year vision to create a sustainable, healthy, and vibrant city. ***The community's vision is to provide housing suitable for all incomes and ages, with a connection to transit and supporting services.***³ The target site, located in the Dixwell neighborhood, sits adjacent to the Dwight neighborhood. Other local community development organizations have successfully redeveloped parts of the Dwight neighborhood located along Whalley Avenue, revitalizing commercial development and establishing a grocery store which provides much-needed resources to what once was a food desert. Remediation and redevelopment of this target site builds off of

³ New Haven Vision 2025, City of New Haven (2015).

the momentum and activity taking place in adjacent areas. Promoting quality, non-subsidized, and workforce housing developments within the city and improving housing affordability are key housing priorities. Multiple planning, redevelopment, retail assessment, transportation plans, and land use assessments have been conducted since 2002. All studies include recommendations for improving the corridor with respect to both transportation functions and the contextual relationship with adjoining neighborhoods. Whalley Avenue is best positioned to accommodate convenience shopping hubs and niche markets with improved streetscape, improved synchronization of traffic signals and pedestrian crossings, and pursuit of shared or public parking opportunities.⁴ ***The proposed redevelopment of the target Sites will advance the City's plan to focus on existing developed corridors that have transportation, employment and utility infrastructure while conserving the region's open space and undeveloped areas.***

ii. Outcomes and Benefits of Reuse Strategy: The proposed project has the potential to increase affordable housing, support local commercial businesses, and increase community wellbeing in the target area. The residential units intend to be moderate to low income units to make housing more accessible and affordable. ***Adding commercial space will attract businesses, create jobs, and increase tax revenue, thus spurring economic growth in the Opportunity Zone.*** The current neighborhood has limited access to green space; SLDC intends to create an inviting green space that will include a community garden located between Whalley Avenue and Dickerman Street. ***This will encourage an increased sense of community among residents, as well as promote increased pedestrian traffic that will be beneficial to local small businesses.*** In addition, in a time of social distancing, open green space is crucial for communities to interact safely. This can be challenging in a city as large as New Haven, where open green space is more limited. Plans for ***energy-efficient redevelopment include photovoltaic cells on the rooftops of the new buildings.*** The project will also provide significant environmental benefits by removing the existing contamination, and creating a healthier and more sustainable environment for the residents of the area.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse: The redevelopment project will primarily be supported by federal Low-Income Housing Tax Credits (LIHTC) which are estimated to cover 60% of the project cost, which is approximately \$24 million. Additional financing from CHFA Taxable Bonds and a FLEX DOH loan are estimated to cover an additional 40% of the development cost. SLDC is also eligible to receive additional remediation funding from the State's Department of Economic and Community Development (DECD). To support green development strategies, SLDC can apply for a loan from the CT Green Bank to accelerate the development with clean energy practices. Funds from the Department of Housing and Urban Development (HUD) can be requested to support the housing project. Additional tax incentives are available since the site is within the opportunity zone and can attract developers to form a partnership with SLDC. In addition, funds from the Local Initiative Support Corporation (LISC) are targeted to support the development.

ii. Use of Existing Infrastructure: The Sites are served by municipal water and sewer services. Located in a historically highly urbanized area, public water and natural gas are available. The Sites have access to electricity, and municipal sewer services. The existing buildings are in poor condition and demolition is required for soil remediation and removal of hazardous building materials. The prime location of the Sites provides access to transit while the improvement of streetscape and sidewalks is included in the City's revitalization goals.

⁴ Whalley Avenue Corridor Study (2010), South Central Regional Council of Governments

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding: *New Haven has been on the State's list of distressed municipalities every year since 2005.* Distressed municipalities are characterized by high unemployment and poverty, aging housing and declining rates of growth in job creation, population, and per capita income. *With a town deficit of 2.7% of total revenue, New Haven has a limited municipal budget.*⁵ *The municipal debt has increased more than 30% over the last 10 years while the demographics of the area indicate a community in need.* The median household income in New Haven and our target area is among the lowest in the State (\$36,813 for the target area and \$41,142 for the City compared to a state average of \$76,106), and the unemployment rate is significantly higher (5.1% and 20.4% for the City and target area, respectively, compared to 4.1% for the State).^{6,7} Without the requested funds, the community does not have the necessary resources to revitalize the neighborhood which is in dire need of economic stimulus. The proposed project will meet the needs of the low-income community by remediating and reusing the contaminated properties.

ii. Threats to Sensitive Populations

(1) *Health or Welfare of Sensitive Populations:* New Haven is home to many sensitive populations including minorities and low-income populations. Approximately **71% of the residents of the target area are minorities** (census 1416), ranking on the 91st and 86th percentile for the county and state.⁶ **Poverty in this neighborhood is also extremely high (30.42%) compared to the state (10%),** and the impoverished in our community are at more risk due to lack of alternatives and access to healthcare.⁸ The rate of disengaged youth is also higher in New Haven (6.68% compared to 5.12% for state), with a higher risk of these youths trespassing brownfield sites.⁵ **Our sensitive populations are threatened by high crime rates in the City;** with a rate of 2,800 crimes per 100,000 people compared to 2,000 for the State.⁵ These sensitive populations are additionally burdened by the low income and poverty levels of the area. Cleanup and subsequent redevelopment of these sites will directly improve the wellbeing of minority populations in this neighborhood and create a cleaner and safer area.

(2) *Greater Than Normal Incidence of Disease and Adverse Health Conditions:* The populations of New Haven and our target area are also highly disadvantaged due to a disproportionate incidence of adverse health conditions and illnesses in the area. The neighborhood is affected by higher-than-recommended levels of environmental pollutants: the **Lead Paint Indicator** (75% of houses built pre-1960 which is the 87th percentile for the state), the **NATA Respiratory Hazard Index** (86th percentile for the state), the fine particulate matter in the air (PM 2.5) (7.52 µg/m³ compared to 7.19 µg/m³ statewide), the **NATA Cancer Risk** (26 lifetime risk per million which is the 86th percentile for the state), the **Superfund Proximity** (0.066 facilities/km distance which is in the 84th percentile compared to the state), and the **Hazardous Waste Proximity** (9.2 facilities/km distance which is the 93rd percentile compared to CT).⁹ New Haven also has an **asthma incidence rate** of 255 cases per 10,000 people,¹⁰ more than three times the Connecticut statewide rate of 53 cases per 10,000 people. The age-adjusted **crude rate of cancer** for New Haven (503.3 cancer cases per 100,000 people) is higher than the state (470.6 cases per 100,000

⁵ New Haven Town Profile (<https://www.ctdata.org/>)

⁶ US Census median household income, unemployment (<https://www.ctdata.org/>)

⁷ EJSCREEN

⁸ 2018 American Community Survey (US Census Bureau)

⁹ EJSCREEN (Census tract 1416)

¹⁰ CT Department of Public Health (Asthma Data by Census Tract and Town, data 2010-2014)

people), particularly for lung and kidney cancers.¹¹ The reported disease rates exhibited in the area are strong indicators of negative health impacts associated with the presence of contamination. This grant will help assess environmental contamination present at the sites in soil and water in order to facilitate their cleanup and redevelopment.

(3) *Disproportionately Impacted Populations:* With a population consisting of **71% minorities** and a **staggering poverty rate of 30%**, the neighborhood is home to those with social needs. The community surrounding the sites is economically stressed, with **low household income** (\$36,813), **extreme unemployment** (20.36%), and **lower than state median house value** (\$151,000 for the census tract; \$204,900 for the state), creates a community that is in desperate need of economic assistance. The City of New Haven has one of the highest poverty rates (25.6%) in the state while 26% of the city's households are collecting **SNAP benefits**.¹² *The neighborhood is a clear demonstration of environmental injustice; the residents of this area disproportionately share the environmental challenges from contamination in the area with 5 EJ SCREEN indicators to rank amongst the highest at the State.*⁹ Completion of environmental cleanup of the target Sites will act as a catalyst to attract more life to the neighborhood. Adding clean, safe, and affordable housing and green space protects the health and wellbeing of the sensitive communities, and the commercial uses will help stimulate the economy and bring in jobs, taxes, and revenue for the neighborhood.

b. Community Engagement

i. Project Involvement/ ii. Project Roles: Several stakeholders will be engaged in facilitating communication and providing feedback regarding cleanup and redevelopment plans for the sites.

Partner Name	Point of Contact	Specific role
City of New Haven	Helen Rosenberg, Economic Development Officer HRosenb@newhavenct.org (203) 946 5889	Attend meetings, inform broader community
St. Luke's Episcopal Church	Georgia Wilson Parish Administrator slchurch1844@snet.net (203) 865-0141	Conduct outreach, engage neighborhood and parish, encourage participation
Yale Law School - Ludwig Center for Community and Economic Development (CED)	Anika Singh Lemar Clinical Associate Professor anika.lemar@ylsclinics.org (203) 432-4022	Organize public meetings, collect community feedback, provide pro bono legal services
University of Connecticut, Connecticut Brownfield Initiative (CBI)	Professor Maria Chrysochoou Director Maria.chrysochoou@uconn.edu (860) 486 3594	Prepare outreach materials and fact sheets, host webinars
Livable City Initiative (LCI)	Cathy Carbonaro-Schroeter Deputy Director Administrative Services ccarbona@newhavenct.gov (203) 946-8274	Facilitate communication between neighborhood residents & businesses, attend meetings

¹¹ CT Department of Public Health (Cancer Incidence Data per town, data 2010-2014)

¹² 2017 American Community Survey, US Census Bureau (<https://www.ctdata.org/>)

Economic Development Corporation of New Haven	Serena Neal-Sanjurjo (203) 946-6437	Attend meetings, facilitate redevelopment plans
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iii. Incorporating Community Input: SLDC was established as a change agent community organization to support the development of the area surrounding the church and thus, is uniquely positioned to involve the community in all stages of the redevelopment. Our community engagement plan includes the following activities:

Public Meetings: SLDC will hold public meetings with our community partners to provide opportunities for the public to learn about cleanup activities and redevelopment plans and gather community opinions. In-person meetings will be hosted at the Church or the City Hall, where we can accommodate social distancing restrictions. Comments may be provided at meetings while additional feedback will be submitted by email or through the website comment form. We will host semi-annual meetings including online meetings through Zoom to accommodate all stakeholders in the COVID-19 era, facilitated by the Yale CED Clinic.

Online Informational Resources: Progress updates will be posted on SLDC's and the City of New Haven's websites. We will also work with our partners such as CBI to develop outreach materials for the public including fact sheets and summaries. In addition, an email list will be created with a readers' digest for project updates and to solicit feedback and comments. Public meeting advertisements will be posted to our partners websites including the City New Haven and the Church in addition to SLCD's website. LCI will directly reach any important residents and businesses in the area to engage the community.

Outreach through St. Luke's Episcopal Church: Since the church is next to the target sites, and a place where the greater New Haven community gathers, it will play an instrumental role in the community engagement for the project. Website posts and brochures will inform the community about the redevelopment of the Sites.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: The proposed cleanup activities to remediate the Sites are outlined in the Alternative #4 of the ABCA. Based on the Phase II ESA findings, the areas that require remediation include a) the former inground hydraulic lifts at Site B where presence of ETPH in soil was identified (AOC-14); and b) sitewide fill materials consisting of sand with brick and asphalt at both Site A and B where arsenic and PAH (benzo(a)anthracene) were identified (AOCs 13 & 18). In both areas, the contaminants of concern exceeded the state's direct exposure criteria for residential uses. Pre-remedial testing activities will be conducted underneath the building of Site A where investigations could not be completed, after the building is demolished. **Several cleanup alternatives were considered with a combination of excavation and placement of an Environmental Land Use Restriction (ELUR) to be the optimum approach based on effectiveness, practicability, and cost.** The State of Connecticut allows for polluted soils to remain in place provided they meet the definition of inaccessible soil and/or environmentally isolated soil where the soil disturbance will be prohibited. Specific cleanup activities under Alternative #4 include the removal of former in-ground lifts, excavation of approximately 500 tons of ETPH-impacted soils in AOC-14, and disposal to a permitted soil recycling facility or disposed at a permitted landfill. The excavated area will be subsequently backfilled with clean soil backfill. Impacted areas with site fill would be capped below the proposed building or paved parking areas provisioned in the new development, placing an ELUR. An approximate 2,000 tons of impacted fill material will be relocated and regraded in the designated ELUR subject areas at both sites. In addition, hazardous building materials abatement is necessary to remove the

asbestos and lead-based paint present in the ceilings and interior walls of the buildings. No impacts to groundwater were identified and remediation is not required.

b. Description of Tasks/Activities and Outputs

Task/Activity 1: Cooperative Agreement Oversight
i. Project Implementation: <i>Discussion of EPA-funded tasks/activities:</i> SLDC will attend the annual National Brownfield Conference. <i>Non-EPA grant resources:</i> SLDC will manage the program and organize the activities proposed in the grant proposal including progress reporting, regularly update ACRES, procurement of a QEP (Qualified Environmental Professional)/ LEP (Licensed Environmental Professional), personnel and financial management, and coordination with stakeholders. Yale CED Clinic will provide post-award legal services including reviewing contracts and agreements (<i>SLDC and partners in-kind contribution towards cost-share</i>).
ii. Anticipated Project Schedule: Months 1-36. QEP procurement within the first 3 months of funding. Quarterly reports and ACRES updates will be submitted throughout the grant period.
iii. Task/Activity Lead: SLDC members and Yale CED Clinic
iv. Outputs: QEP/LEP procurement; Quarterly progress reports; ACRES updates; conference attendance, financial reports
Task/Activity 2: Community Engagement
i. Project Implementation: <i>Discussion of EPA-funded tasks/activities:</i> Preparation of informational materials, and surveys for community engagement. <i>Non-EPA grant resources:</i> SLDC will conduct community engagement activities as outlined in Section 2.b. Specific activities include semiannual public meetings (online and in-person), regular updates of SLDC's website (<i>SLDC in-kind contribution towards cost-share</i>).
ii. Anticipated Project Schedule: Months 1-36. 1 st public meeting will occur in the beginning of the project, semiannual thereafter. Continuous website updates and semiannual surveys.
iii. Task/Activity Lead: SLDC members and project partners
iv. Outputs: Informational and outreach materials; presentations; meeting minutes and sign-in sheets; website updates; and community feedback collected through surveys.
Task/Activity 3: Cleanup Planning
i. Project Implementation: <i>Discussion of EPA-funded tasks/activities:</i> Prior to cleanup activities the QEP/LEP will a) conduct the necessary pre-remedial testing; b) prepare the final remedial action report (RAP), ABCA, and QAPP to meet federal and state requirements; c) conduct a pre-bid site visit and review contractor bids; and d) prepare the soil management plan and conduct the appropriate permitting for the disposal facilities. <i>Non-EPA grant resources:</i> None.
ii. Anticipated Project Schedule: Months 3-9. After the procurement of the LEP/QEP the pre-remedial activities will be conducted within 3-6 months, the RAP and ABCA will be finalized within 6 months, contractor bids are approximated within 6-9 months together with the soil management plan and necessary permitting.
iii. Task/Activity Lead: Contractual (QEP/LEP) with assistance from SLDC
iv. Outputs: Additional soil samples; Final RAP; Final ABCA; Contractor bid package; Soil Management Plan; Permits.
Task/Activity 4: Cleanup Activities and Reporting
i. Project Implementation <i>Discussion of EPA-funded tasks/activities:</i> As outlined in detail in the attached ABCA, the cleanup activities include: a) Removal of in-ground hydraulic lifts; b) Soil excavation, transportation, testing, and disposal in AOC-14; b) Clean soil backfill for AOC-14; c) Limited soil excavation, placement and re-grading of site fill materials in AOCs 13 and 18; d) Hazardous building materials abatement; e) Preparation and application of ELUR;

f) receptor survey; g) verification report; and h) field oversight and post-remedial sampling.
<i>Non-EPA grant resources:</i> Grant closure report and additional site-specific cleanup activities.
ii. Anticipated Project Schedule: Months 10-36. Cleanup activities (a, b, c, d) and placement of ELUR are anticipated to start on month 10 and take approximately 12-18 months. Verification and post-remedial sampling is anticipated to take place from months 28-36.
iii. Task/Activity Lead: Contractual (QEP/LEP) with assistance from SLDC.
iv. Outputs: Removal of contaminated soil; Placement of ELUR; Abatement and cleanup in accordance with RAP and ABCA; Verification report.

c. Cost Estimates

Budget table for 117-125 Whalley Avenue (Site A)						
Budget Categories		Task 1	Task 2	Task 3	Task 4	Totals
Direct Costs	Personnel	-	-	-	-	-
	Fringe Benefits	-	-	-	-	-
	Travel	\$3,000	-	-	-	\$3,000
	Equipment	-	-	-	-	-
	Supplies	-	-	-	-	-
	Contractual	-	-	\$31,000	\$142,000	\$173,000
	Meeting Expenses	-	\$1,500	-	-	\$1,500
	Total	\$3,000	\$1,500	\$31,000	\$142,000	\$177,500
Total Direct Costs		\$3,000	\$1,500	\$31,000	\$142,000	\$177,500
Indirect Costs		-	-	-	-	-
Total Federal Funding		\$3,000	\$1,500	\$31,000	\$142,000	\$177,500
Cost share		\$13,750	\$3,750	-	\$32,500	\$50,000
Total Budget Site A		\$16,250	\$5,250	\$31,000	\$174,500	\$227,500
Budget table for 129 Whalley Avenue (Site B)						
Budget Categories		Task 1	Task 2	Task 3	Task 4	Totals
Direct Costs	Personnel	-	-	-	-	-
	Fringe Benefits	-	-	-	-	-
	Travel	\$3,000	-	-	-	\$3,000
	Equipment	-	-	-	-	-
	Supplies	-	-	-	-	-
	Contractual	-	-	\$17,000	\$301,000	\$318,000
	Meeting Expenses	-	\$1,500	-	-	\$1,500
	Total	\$3,000	\$1,500	\$17,000	\$301,000	\$322,500
Total Direct Costs		\$3,000	\$1,500	\$17,000	\$301,000	\$322,500
Indirect Costs		-	-	-	-	-
Total Federal Funding		\$3,000	\$1,500	\$17,000	\$301,000	\$322,500
Cost share		\$13,750	\$3,750	-	\$32,500	\$50,000
Total Budget Site B		\$16,250	\$5,250	\$17,000	\$331,500	\$372,500
Total Project Budget						

Total Federal Funding	\$6,000	\$3,000	\$48,000	\$443,000	\$500,000
Total Cost share	\$27,500	\$7,500	-	\$65,000	\$100,000
Total Project Budget	\$33,500	\$10,500	\$48,000	\$508,000	\$600,000
Cost Breakdown for Site A & Site B					
Task/Activity 1: Cooperative Agreement Oversight					
Task 1 activities are estimated for both properties at \$33,500 and are evenly split between the two properties . Travel costs for SLDC members to travel to the National Brownfields Conference are budgeted (total \$6,000 : 2 people; 2 conferences @ \$500 per airfare and \$250/day/person for lodging and meals for 4 days). The cost share for Task 1 (\$27,500) is provided by SLDC members' time to manage the program and organize the activities (\$17,500 : 250 hours of work @ \$70/hour) (towards 5% admin costs) and in-kind legal services from Yale CED Clinic (programmatic costs) (\$10,000). (*Hardship waiver requested)					
Task/Activity 2: Community Engagement					
Task 2 activities are estimated for both properties at \$10,500 and are evenly split between the two properties . A total of \$3,000 is budgeted for outreach materials (fliers, fact sheets) and meeting costs (\$1,200 for materials, \$1,800 for 6 meetings at \$300/meeting). The cost share for Task 2 is provided by the SLDC members' time to conduct outreach (total \$7,500 : 108 hours of work @ \$70/hour) (towards 5% admin costs). (*Hardship waiver requested)					
Task/Activity 3: Cleanup Planning					
Planning activities for both sites include remedial planning @ \$5,000, contractor bidding @ \$5,000, soil management plan and permitting @ \$8,000, remedial action report @ \$10,000, final ABCA @ \$1,000, and Quality Assurance Plan (QAPP) @ \$5,000 (total \$34,000). In addition, contractual costs for pre-remedial testing on Site A are estimated @ \$12,000. A total of \$31,000 is budgeted for cleanup planning activities for Site A (50% of \$34,000 + \$12,000 +15% contingency not included in the draft ABCA) and \$17,000 for Site B (50% of \$34,000).					
Task/Activity 4: Cleanup Activities and Reporting					
Cleanup Activities for both properties are estimated at \$247,500 and are evenly split between the two properties and include oversight/post-remedial sampling @ \$25,000; hazardous building materials abatement @ \$60,000; the excavation and regraded fill materials @ \$110,000; preparation and application of ELUR of property land records @ \$35,000; receptor survey @ \$2,500; verification report @ \$15,000. Specific cleanup activities for Site A are estimated at \$142,000 (\$123,750 as 50% of \$247,500 + 15% contingency). Specific cleanup activities for Site B include an additional \$138,000 , which includes the removal of in-ground hydraulic lifts @ \$20,000; soil excavation @ \$100,000; and clean soil backfill @ \$18,000. The total cost of cleanup activities for Site B is estimated at \$301,000 (\$123,750 as 50% of 247,500 + \$138,000 + 15% contingency not included in the draft ABCA). The cost share requirement for Task 4 will be covered by an additional \$5,000 to prepare a closure report (programmatic cost) and the additional \$60,000 will be covered by requesting assistance from the City of New Haven which has previously supported the efforts of SLDC towards site specific activities (*Hardship waiver requested).					

d. Measuring Environmental Results

Upon the notification of the award, SLDC will lay out a detailed plan to track and evaluate the project's progress. The plan will entail key deadlines and project milestones relative to the project outputs. The program will be reviewed weekly and adjusted accordingly in case any deviations occur. Progress will be reported to EPA through frequent updating of the ACRES database. We

will evaluate the project's performance and track the results and outcomes including: a) the quantity of contaminated soil removed; b) the quantity of hazardous building materials abated; c) the acreage of land remediated; and d) acreage of land redeveloped and brought to effective use.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure: The EPA awards will be managed by SLDC Board of Directors. All members of the Board of Directors are actively involved. In addition, the team will include contracted licensed professionals for technical advice. SLDC has previously managed similar development projects. We have the organizational capability to effectively manage EPA funds in a timely and responsible manner. SLDC will also work with the project partners to inform the community of program goals and engage it in the development of a plan for the area.

ii. Description of Key Staff: **Mr. Fred Taylor, Vice President** will serve as the project manager. Mr. Taylor has many years of experience in managing development projects. **Samuel Andoh, President** of SLDC will provide fiscal oversight. Professor Andoh holds a faculty position in the Economic and Finance Department at Southern Connecticut State University. With more than 20 years of experience and a background in economics, Professor Andoh will maintain financial control and administrative procedures to ensure compliance with program regulations.

ii. Acquiring Additional Resources: To provide the technical expertise and conduct the proposed cleanup activities, SLDC will contract with licensed environmental professionals. We will seek the assistance of our municipal partner in the Planning Department in the City of New Haven to ensure alignment with the City's plans. Legal assistance will be provided by our partners in the Yale Law School CED Clinic and Anika Singh Lemar, Clinical Associate Professor of Law.

b. Past Performance and Accomplishments

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements/ (1) Accomplishments

SLDC has been previously awarded federal and non-federal assistance agreements, all of which were used in an efficient, successful, and timely manner.

Type of funding	Year	Amount	Use of Funds
US DOH pre-development loan	2012	\$250,000	Miscellaneous studies, and consultant fees to develop materials for affordable housing funding from DOH and CHFA.
CT DECD Petroleum Assessment Grant	2016	\$200,000	Assessment of 10-12 Dickerman St. and 34-36 Sperry St (unused portion returned to the State).
U.S. HUD Community Development Block Grant	2018	\$340,000	Acquisition of 34-36 Sperry Street and 10-12 Dickerman St.
HOME Livable City Initiative	2019	\$100,000	Redevelopment of 16 Dickerman St.
CT HFA, State Housing Tax Credit Contributions (HTCC)	2017 2018	\$365,723	Redevelopment of 16 Dickerman St. (sold to a low-income homebuyer).

(2) Compliance with Grant Requirements: SLDC has consistently met the cooperative agreement requirements and ensured the timely achievement of the results through effective management of the projects. SLDC has also had experience effectively managing a budgeted environmental remediation process. When SLDC purchased the 10-12 Dickerman Street and 34-36 Sperry Street, \$221,615.00 from the initial purchase price was initially placed into an interest-bearing escrow account for the purpose of environmental remediation which will be completed by the deadline and within the budget.

Application for FY 2021 EPA Brownfields Cleanup Grant

St. Luke's Development Corporation

Threshold Criteria

1. Applicant Eligibility

St. Luke's Development Corporation is a 501(c)(3) corporation established in 1997 to undertake activities related to and otherwise assist, create, and foster community and economic development for the benefit of the New Haven community. The corporation is demonstrating tax-exempt status under section 501(c)(3) of the Internal Revenue Code. Documentation of the 501(c)(3) status is attached in **Appendix A**.

2. Previously Awarded Cleanup Grants

The target sites of this FY2021 EPA Cleanup Grant include the 117-125 & 129 Whalley Avenue properties. **None of the properties** have received funding from a previously awarded EPA Cleanup grant.

Responses to threshold criteria (items 3-12) for 117-125 Whalley Avenue, New Haven, CT

3. Site Ownership

St. Luke's Development Corporation is the sole owner of 117-125 Whalley Avenue (hereinafter "Site A"). The title is fee simple. St. Luke's Development Corporation acquired Site A on 04/11/2002 and intends to retain ownership of Site A for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of Site A.

4. Basic Site Information

Name of the site: 117-125 Whalley Avenue (Site A)

Address of the site: 117-125 Whalley Avenue, New Haven, CT 06511 (Parcel ID: 295 0301 03300)

Current owner of the sites: St. Luke's Development Corporation

5. Status and History of Contamination at the Site

- a. Site A has co-mingled contamination of predominately hazardous substances and some petroleum contaminants.
- b. 117-125 Whalley Avenue was historically used as a residential property (until 1929) and then as an automotive service center. The automotive center the property was occupied by various automotive service centers including until 1995 when it was converted into multi-tenant commercial use. Currently, there are commercial/retail tenants present including restaurants, but the majority of the property remains underutilized.
- c. Several environmental concerns exist at Site A. A Phase I Environmental Site Assessment conducted on May 2016 identified four potential Areas of Concern (AOCs) on Site A including building interiors historically used for automotive repair, historical underground storage tanks (USTs) in the parking lot, suspected trench drain, and potential site-wide fill contamination. A subsequent Phase II Environmental Site Assessment confirmed the presence of polluted fill sitewide. Presence of hazardous building materials is also confirmed on the building of Site A at the 2018 Hazardous Building Materials Assessment.

- d. The contamination at Site A occurred by previous uses as an automotive center and polluted fill that was present at the site. Extractable total petroleum hydrocarbons (ETPH), volatile organic compounds (VOCs), heavy metals such as RCRA 8 metals, and polycyclic aromatic hydrocarbons (PAHs) are present at the site. Heavy metals (arsenic) and PAHs (benzo(a)anthracene) in soils exceed the remedial standard regulations according to the State of Connecticut and need to be remediated. The groundwater is not impacted at Site A. Hazardous building materials including asbestos and lead-based paint are present at the building of Site A.

6. Brownfield Sites Definition

Site A meets the definition of a brownfield site and it is eligible to receive EPA cleanup funds. We affirm that: a) Site A is **not** listed or proposed for listing on the National Priorities List; b) Site A is **not** subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) Site A is **not** subject to the jurisdiction, custody, or control of the U.S. government.

7. Environmental Assessment Required for Cleanup Grant Applications

A Phase II Environmental Site Assessment was completed on May 2016 by GZA GeoEnvironmental, Inc. according to ASTM Standards. Other investigations conducted at Site A include a Phase I Environmental Site Assessment on May 2016 and a Hazardous Building Materials Assessment in January 2018.

8. Enforcement or Other Actions

Site A is not currently in a regulatory program. The remediation of Site A will be performed according to the Connecticut Department of Environmental Protection (CTDEEP) Remediation Standard Regulations, Sections 22a-133k-1 through 22a-133k-3, inclusive, of the Regulations of Connecticut State Agencies (RCSA). The remediation would be overseen by a Connecticut Licensed Environmental Professional (LEP). The hazardous materials abatement of the buildings would be conducted/overseen by a licensed abatement contractor.

9. Sites Requiring a Property-Specific Determination

Site A does not require a Property-Specific Determination.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

iii. Landowner Protections from CERCLA Liability

(1) Bona Fide Prospective Purchaser Liability Protection

(a) Information on the Property Acquisition: St. Luke's Development Corporation acquired Site A on April 11, 2002 through a negotiated purchase from a private individual, John H. Maloney. The title is fee simple. St. Luke's Development Corporation has no familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators of Site A.

(b) Pre-Purchase Inquiry: For Site A, a Phase I Environmental Site Investigation was conducted on September 2001 and a Phase II Environmental Site Investigation on December 2001, both prepared by Payne Environmental, LLC. Both Phase I and Phase II Environmental Site Investigations were conducted by a qualified engineering firm according to ASTM Practice

E1527-13. The firm was selected to perform the work based on the selected experience and credentials. Since the Phase I Investigation was conducted more than 180 days prior to the date of the property acquisition, a Phase II Investigation was followed on December 2001 (within 180 days) to provide an updated and more complete environmental assessment of Site A. St. Luke's Development Corporation has conducted all appropriate inquiries (AAI) for site A and meets the criteria of the bona fide prospective purchaser.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal: The disposal of hazardous substances at Site A occurred prior to acquisition of the property on April 11, 2002. St. Luke's Development Corporation did not cause or contributed any release of hazardous substances at the site. St. Luke's Development Corporation has not arranged, at any time, the disposal or transport of hazardous substances at Site A.

(d) Post-Acquisition Uses: After acquisition, Site A was occupied by various commercial/retail tenants including Whalley Seafood, Music Haven, Beacon School and Papa John's Pizza.

(e) Continuing Obligations:
Since the acquisition of Site A, St. Luke's Development Corporation has performed several environmental site assessments with the ultimate goal the remediation of the property. Phase I & II Environmental Site Assessments were completed on May 2016 and a Hazardous Building Materials Assessment on January 2018. Based on the findings of these assessments, there was no known or suspected conditions that are considered to represent continuous or future releases. Areas with known contamination from previous releases were communicated to the tenants and isolated where possible to prevent exposure to any hazardous substances. As such, reasonable steps were taken to stop any continuing releases, prevent any threatened future release, and prevent or limit exposure to any previously released hazardous substance.

St. Luke's Development Corporation affirms its commitment to: (i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; (ii) assist and cooperate with those performing the cleanup and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) provide all legally required notices.

b. Property Ownership Eligibility – Petroleum Sites: N/A

11. Cleanup Authority and Oversight Structure

- a. Cleanup Oversight: St. Luke's Development Corporation will enroll to the State's Voluntary Remediation Program (VRP) under Connecticut General Statutes (CGS) 22a-133x to facilitate cleanup. Verification reporting will be conducting in accordance with the Connecticut Remediation Standard Regulations (CT RSRs) by a Licensed Environmental Professional (LEP). The procurement of the LEP will be conducted through a competitive bidding process according to the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326.
- b. Neighboring properties: Not applicable. No cleanup activities, confirmation sampling, or monitor offsite migration of contamination will be required access to neighboring properties.

12. Community Notification

a) Draft Analysis of Brownfield Cleanup Alternatives

The draft Analysis of Brownfield Cleanup Alternatives was made available to the public through the St. Luke's Development Corporation website and it was also presented by an environmental professional during the online public meeting held on Monday, October 19, 2020. The draft ABCA summarized the site and contamination issues, cleanup standards, and applicable laws; the cleanup alternatives considered and the proposed cleanup. One ABCA was prepared for both 117-125 Whalley Avenue (Site A) and 129 Whalley Avenue (Site B) because the properties are adjacent, and they were addressed together in previous investigations. A Copy of the draft ABCA is provided as **Attachment B**.

b) Community Notification Ad

A community notification ad for the public meeting and invitation to review and comment on the draft proposal and ABCA was posted on St. Luke's Development Corporation website (<https://www.sldcct.org/news/>) on October 14th, 2020. Both 117-125 Whalley Avenue (Site A) and 129 Whalley Avenue (Site B) were discussed at the public meeting. The public meeting was further advertised on New Haven Independent, and the New Haven Register. A copy of the community notification ads are attached in **Attachment C**.

c) Public meeting

A public meeting was held on October 19, 2020 at 6:00-8:00 pm, virtually, through Zoom. During the meeting, the ABCA and narrative proposal were presented to the 26 participants. Both 117-125 Whalley Avenue (Site A) and 129 Whalley Avenue (Site B) were discussed at the public meeting. **Attachment D** include a meeting notes or a summary of the public meeting, participant list, the comments of the public comments received, and our response to the applicants.

d) Submission of Community Notification Documents

The following documents are attached in the application:

Document	Attachment
Draft ABCA	B
Copy of Community Notification Ad	C
Meeting Notes	D
Comments Received	D
Applicants Response to comments	D
Meeting participant list	D

Responses to threshold criteria (items 3-12) for 129 Whalley Avenue, New Haven, CT

3. Site Ownership

St. Luke's Development Corporation is the sole owner 129 Whalley Avenue (hereinafter "Site B"). The title is fee simple. St. Luke's Development Corporation acquired Site B on 04/11/2002

and intends to retain ownership of Site B for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of Site B.

4. Basic Site Information

Name of the site: 129 Whalley Avenue (Site B)

Address of the site: 129 Whalley Avenue, New Haven, CT 06511 (Parcel ID: 295 0301 03400)

Current owner of the sites: St. Luke's Development Corporation

5. Status and History of Contamination at the Site

- a. Site B has co-mingled contamination of predominately hazardous substances and some petroleum contaminants.
- b. Site B was historically occupied by a residence until the early 1930s when it was converted to commercial use. From the early 1930s through approximately 1960, the property was used for offices and as headquarters for a plumbing company, operations unknown. The property was occupied by New Haven Chrysler-Plymouth Inc. Used Car Division, which performed both auto sales and auto repair services, in the early 1970s for an unknown amount of time. The property was then occupied by Acme Auto Body from approximately 1974 through at least 1980. Since the early 1990s through 2016, the property has been occupied by Aamity Car and Truck Rental which also performed repairs.
- c. Several environmental concerns exist at Site B. A Phase I Environmental Site Assessment conducted on May 2016 identified five potential Areas of Concern (AOCs) on Site B that were associated with the in-ground hydraulic lifts, floor drain by lifts, oil storage, overhead doors, and potential site-wide fill. A subsequent Phase II Environmental Site Assessment confirmed the presence of polluted fill sitewide and in-ground hydraulic lifts. Presence of hazardous building materials is also confirmed on the building of Site B at the 2018 Hazardous Building Materials Assessment.
- d. The contamination at Site B occurred by previous uses as an automotive center and polluted fill that was present at the site. Extractable total petroleum hydrocarbons (ETPH), volatile organic compounds (VOCs), heavy metals such as RCRA 8 metals, and polycyclic aromatic hydrocarbons (PAHs) are present at the site. Heavy metals (arsenic) and ETPH in soils exceed the remedial standard regulations according to the State of Connecticut and need to be remediated. The groundwater is not impacted at Site B. Hazardous building materials including asbestos and lead-based paint are present at the building of Site B. No hazardous waste was generated by the last tenant and the contamination is from previous uses.

6. Brownfield Sites Definition

Site B meets the definition of a brownfield site and it is eligible to receive EPA cleanup funds. We affirm that: a) Site B is **not** listed or proposed for listing on the National Priorities List; b) Site B is **not** subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) Site B is **not** subject to the jurisdiction, custody, or control of the U.S. government.

7. Environmental Assessment Required for Cleanup Grant Applications

A Phase II Environmental Site Assessment was completed on May 2016 by GZA GeoEnvironmental, Inc. according to ASTM Standards. Other investigations conducted at Site B

include a Phase I Environmental Site Assessment on May 2016, a Supplemental Environmental Assessment in October 2016, and a Hazardous Building Materials Assessment on January 2018.

8. Enforcement or Other Actions

Site B is not currently in a regulatory program. The remediation of Site B will be performed according to the Connecticut Department of Environmental Protection (CTDEEP) Remediation Standard Regulations, Sections 22a-133k-1 through 22a-133k-3, inclusive, of the Regulations of Connecticut State Agencies (RCSA). The remediation would be overseen by a Connecticut Licensed Environmental Professional (LEP). The hazardous materials abatement of the buildings would be conducted/overseen by a licensed abatement contractor.

9. Sites Requiring a Property-Specific Determination

Site B does not require a Property-Specific Determination.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

iii. Landowner Protections from CERCLA Liability

(1) Bona Fide Prospective Purchaser Liability Protection

(a) Information on the Property Acquisition: St. Luke's Development Corporation acquired Site B on April 11, 2002 through a negotiated purchase from a private individual, John H. Maloney. The title is fee simple. St. Luke's Development Corporation has no familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators of Site B.

(b) Pre-Purchase Inquiry: For Site B, a Phase I Environmental Site Investigation was conducted on September 2001 and a Phase II Environmental Site Investigation on December 2001, both prepared by Payne Environmental, LLC. Both Phase I and Phase II Environmental Site Investigations were conducted by a qualified engineering firm according to ASTM Practice E1527-13. The firm was selected to perform the work based on the selected experience and credentials. Since the Phase I Investigation was conducted more than 180 days prior to the date of the property acquisition, a Phase II Investigation was followed on December 2001 (within 180 days) to provide an updated and more complete environmental assessment of Site B. St. Luke's Development Corporation has conducted all appropriate inquiries (AAI) for site B and meets the criteria of the bona fide prospective purchaser.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal: The disposal of hazardous substances at Site B occurred prior to acquisition of the property on April 11, 2002. St. Luke's Development Corporation did not cause or contributed any release of hazardous substances at the site. St. Luke's Development Corporation has not arranged, at any time, the disposal or transport of hazardous substances at Site B.

(d) Post-Acquisition Uses: After acquisition, Site B was occupied by Aamity Car and Truck Rental. According to the 2016 Phase I Site investigation, Aamity Car & Truck Repair did not generate any hazardous substances. Small amounts of used oil, used oil filters and antifreeze (approximately three 55-gallon drums per year) that are properly disposed by a waste hauler.

(e) Continuing Obligations:

Since the acquisition of Site B, St. Luke's Development Corporation has performed several environmental site assessments with the ultimate goal the remediation of the property. Phase I & II Environmental Site Assessments were completed in May 2016, a Supplemental Site Assessment

on October 2016, and a Hazardous Building Materials Assessment on January 2018. Based on the findings of these assessments, there was no known or suspected conditions that are considered to represent continuous or future releases. Areas with known contamination from previous releases were communicated to the tenant and isolated where possible to prevent exposure to any hazardous substances. As such, reasonable steps were taken to stop any continuing releases, prevent any threatened future release, and prevent or limit exposure to any previously released hazardous substance.

St. Luke's Development Corporation affirms its commitment to: (i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; (ii) assist and cooperate with those performing the cleanup and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) provide all legally required notices.

b. Property Ownership Eligibility – Petroleum Sites: N/A

11. Cleanup Authority and Oversight Structure

- a. Cleanup Oversight: St. Luke's Development Corporation will enroll to the State's Voluntary Remediation Program (VRP) under Connecticut General Statutes (CGS) 22a-133x to facilitate cleanup. Verification reporting will be conducting in accordance with the Connecticut Remediation Standard Regulations (CT RSRs) by a Licensed Environmental Professional (LEP). The procurement of the LEP will be conducted through a competitive bidding process according to the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326.
- b. Neighboring properties: Not applicable. No cleanup activities, confirmation sampling, or monitor offsite migration of contamination will be required access to neighboring properties.

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advertised on New Haven Independent, and the New Haven Register. A copy of the community notification ads are attached in **Attachment C**.

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Document	Attachment
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Copy of Community Notification Ad	C
Meeting Notes	D
Comments Received	D
Applicants Response to comments	D
Meeting participant list	D

13. Statutory Cost Share

- a. Sources for required cost-share: Although SLDC is requesting a hardship waiver, we are committed to providing the cost-share of \$100,000 as the prerequisite for a 20% of federal funds requested (\$500,000). The cost-share requirements will be met through eligible activities including the in-kind services covering the 5% administrative cost, additional programmatic costs such as conducting planning for the redevelopment activities, and legal services. SLSC will also seek opportunities to augment matching funds from the City of New Haven (non-federal source) to contribute to cleanup activities.
- b. Hardship Waiver Request: SLDC is requesting a Hardship Waiver of the 20% cost share associated with the EPA Cleanup Grant. A justification for the waiver request is included as **Attachment E**.

THRESHOLD CRITERIA - ATTACHMENT A
St. Luke's Development Corporation
Documentation of the 501(c)(3) status

Internal Revenue Service
P. O. Box 2508
Cincinnati, OH 45201

Department of the Treasury

Date: 5-4-2015

Person to Contact: Mr Jackson 196112

Anika Singh Lemar
Jerome N Frank Legal Service Organization
Po Box 209090
New Haven, CT 06520

Toll Free Telephone Number:
877-829-5500

Dear Sir or Madam:

This is in response to your letter of July 7, 2014 requesting copies for St Lukes Development Corporation.

Enclosed are the copies you requested.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,

A handwritten signature in black ink that reads "Tamera Ripperda". The signature is written in a cursive, flowing style.

Tamera Ripperda
Director, Exempt Organizations

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: JUN 30 2000

Employer Identification Number:

ST LUKES DEVELOPMENT CORPORATION
C/O THE REV DR VICTOR ROGERS
111 WHALLEY AVE
NEW HAVEN, CT 06511

DLN:
17053157028040
Contact Person:
THOMAS S BOHNE ID# 31373
Contact Telephone Number:
(877) 829-5500
Accounting Period Ending:
December 31
Foundation Status Classification:
509(a)(1)
Advance Ruling Period Begins:
June 1, 2000
Advance Ruling Period Ends:
December 31, 2004
Addendum Applies:
Yes

Dear Applicant:

Based on information you supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from federal income tax under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3).

Because you are a newly created organization, we are not now making a final determination of your foundation status under section 509(a) of the Code. However, we have determined that you can reasonably expect to be a publicly supported organization described in sections 509(a)(1) and 170(b)(1)(A)(vi).

Accordingly, during an advance ruling period you will be treated as a publicly supported organization, and not as a private foundation. This advance ruling period begins and ends on the dates shown above.

Within 90 days after the end of your advance ruling period, you must send us the information needed to determine whether you have met the requirements of the applicable support test during the advance ruling period. If you establish that you have been a publicly supported organization, we will classify you as a section 509(a)(1) or 509(a)(2) organization as long as you continue to meet the requirements of the applicable support test. If you do not meet the public support requirements during the advance ruling period, we will classify you as a private foundation for future periods. Also, if we classify you as a private foundation, we will treat you as a private foundation from your beginning date for purposes of section 507(d) and 4940.

Grantors and contributors may rely on our determination that you are not a private foundation until 90 days after the end of your advance ruling period. If you send us the required information within the 90 days, grantors and contributors may continue to rely on the advance determination until we make

Letter 1045 (DO/CG)

ST LUKES DEVELOPMENT CORPORATION

a final determination of your foundation status.

If we publish a notice in the Internal Revenue Bulletin stating that we will no longer treat you as a publicly supported organization, grantors and contributors may not rely on this determination after the date we publish the notice. In addition, if you lose your status as a publicly supported organization, and a grantor or contributor was responsible for, or was aware of, the act or failure to act, that resulted in your loss of such status, that person may not rely on this determination from the date of the act or failure to act. Also, if a grantor or contributor learned that we had given notice that you would be removed from classification as a publicly supported organization, then that person may not rely on this determination as of the date he or she acquired such knowledge.

If you change your sources of support, your purposes, character, or method of operation, please let us know so we can consider the effect of the change on your exempt status and foundation status. If you amend your organizational document or bylaws, please send us a copy of the amended document or bylaws. Also, let us know all changes in your name or address.

As of January 1, 1984, you are liable for social security taxes under the Federal Insurance Contributions Act on amounts of \$100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Organizations that are not private foundations are not subject to the private foundation excise taxes under Chapter 42 of the Internal Revenue Code. However, you are not automatically exempt from other federal excise taxes. If you have any questions about excise, employment, or other federal taxes, please let us know.

Donors may deduct contributions to you as provided in section 170 of the Internal Revenue Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for Federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Donors may deduct contributions to you only to the extent that their contributions are gifts, with no consideration received. Ticket purchases and similar payments in conjunction with fundraising events may not necessarily qualify as deductible contributions, depending on the circumstances. Revenue Ruling 67-246, published in Cumulative Bulletin 1967-2, on page 104, gives guidelines regarding when taxpayers may deduct payments for admission to, or other participation in, fundraising activities for charity.

You are not required to file Form 990, Return of Organization Exempt From Income Tax, if your gross receipts each year are normally \$25,000 or less. If you receive a Form 990 package in the mail, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally \$25,000 or less, and sign the return. Because you will be treated as a public charity for return filing purposes during your entire advance ruling period, you should file Form 990 for each year in your advance ruling period.

ST LUKES DEVELOPMENT CORPORATION

that you exceed the \$25,000 filing threshold even if your sources of support do not satisfy the public support test specified in the heading of this letter.

If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. A penalty of \$20 a day is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed \$10,000 or 5 percent of your gross receipts for the year, whichever is less. For organizations with gross receipts exceeding \$1,000,000 in any year, the penalty is \$100 per day per return, unless there is reasonable cause for the delay. The maximum penalty for an organization with gross receipts exceeding \$1,000,000 shall not exceed \$50,000. This penalty may also be charged if a return is not complete. So, please be sure your return is complete before you file it.

You are not required to file federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You are required to make your annual information return, Form 990 or Form 990-EZ, available for public inspection for three years after the later of the due date of the return or the date the return is filed. You are also required to make available for public inspection your exemption application, any supporting documents, and your exemption letter. Copies of these documents are also required to be provided to any individual upon written or in person request without charge other than reasonable fees for copying and postage. You may fulfill this requirement by placing these documents on the Internet. Penalties may be imposed for failure to comply with these requirements. Additional information is available in Publication 557, Tax-Exempt Status for Your Organization, or you may call our toll free number shown above.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, we will assign a number to you and advise you of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

If we said in the heading of this letter that an addendum applies, the addendum enclosed is an integral part of this letter.

Because this letter could help us resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

We have sent a copy of this letter to your representative as indicated in your power of attorney.

-4-

ST LUKES DEVELOPMENT CORPORATION

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,

Steven T. Miller

Steven T. Miller
Director, Exempt Organizations

Enclosure(s):
Form 572-C

Letter 1045 (DO/CG)

THRESHOLD CRITERIA - ATTACHMENT B
St. Luke's Development Corporation
Draft ABCA



Known for excellence. Built on trust.



ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

**117-125 & 129 Whalley Avenue
New Haven, CT**

October 2020

File No. 050045791.17



PREPARED FOR:

St. Luke's Development Corp.
New Haven, Connecticut

GZA GeoEnvironmental, Inc.

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October 13, 2020
File No. 05.0045791.17

St. Luke's Development Corp.
111 Whalley Ave.
New Haven, Connecticut, 06511

Attention: Dr. Samuel Andoh

Re: Analysis of Brownfields Cleanup Alternatives - DRAFT
117-125 & 129 Whalley Avenue
New Haven, CT

GZA GeoEnvironmental, Inc. (GZA) is pleased to present this Analysis of Brownfields Cleanup Alternatives (ABCA) to St. Luke's Development Corp. for the properties at 117-125 & 129 Whalley Avenue in New Haven, Connecticut (hereafter collectively referred to as the Site). The ABCA was prepared based on GZA's 2016 Phase I and Phase II/III Environmental Site Investigations of the Site prepared for the City of New Haven and the October 2020 Draft Remedial Action Plan and is subject to the Limitations described in Appendix A of the report.

We trust this report satisfies your present requirements; should you require additional information, please call the undersigned at (860) 286-8900.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Christopher J. Frey, LEP
Senior Project Manager

Kathleen A. Cyr, P.E., LEP,
Consultant/Reviewer

Adam T. Henry LEP
Associate Principal

Attachment: ABCA Report



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1.0 INTRODUCTION AND BACKGROUND

GZA GeoEnvironmental, Inc. (GZA) has prepared this Analysis of Brownfields Cleanup Alternatives (ABCA) on behalf of St. Luke's Development Corp. (SLDC) for the 117-125 & 129 Whalley Avenue parcels in New Haven, Connecticut (hereafter collectively referred to as the Site) in support of a proposal to the Environmental Protection Agency (EPA) to provide a grant to facilitate the cleanup and redevelopment of the Site. The ABCA identifies areas of the Site requiring remedial actions and applicable cleanup standards, provides information regarding the degree of impacts, the nature and extent of contaminants of concern and provides an analysis of reasonable alternatives, taking into account such factors as effectiveness, implementability, costs, and sustainability, and identifies the preferred cleanup methods, based on the analyses performed.

1.1 SITE LOCATION

The site consists of two contiguous parcels located at 117-125 Whalley Avenue and 129 Whalley Avenue (herein referred to as "the Site"). The 117-125 and 129 Whalley Avenue parcels are approximately 200 feet northeast of the corner of Whalley Avenue and Sperry Street in an area of mixed residential and commercial development in New Haven, Connecticut. The nearest downgradient surface water body in the vicinity of the Site is the West River, located approximately 1 mile southwest of the Site.

A Site Locus Plan is attached as Figure 1.

The Site consists of two contiguous parcels totaling approximately 0.61 acre and containing two commercial buildings. The parcels and buildings are as follows:

Address	Map/Block/Lot	Parcel Size	Improvements
117-125 Whalley Avenue	295/301/33	0.35 acres	10,534-square foot (gross area) commercial building and asphalt parking
129 Whalley Avenue	295/301/34	0.26 acres	3,900-square foot garage building and asphalt parking

The Site is served by municipal water and sewer services and the buildings are supplied with natural gas. Portions of the 117-125 Whalley Avenue building are heated with fuel oil stored in aboveground storage tanks.

1.2 PREVIOUS SITE USES

117-125 Whalley Avenue was historically developed with multiple residences until 1929 when the residences were demolished, and a building was constructed for use as an automotive service center. From approximately 1929 to 1995, the property was occupied by various automotive service centers including: Goodrich Super Service Inc. Auto Repairs; Smeltzer Safety Service; Whalley Super Service; Superior Auto Top Co; Maloney Motors Autos; Champion Auto Service Repairs; Champion Auto Safety Service Inc.; and Champion Auto Brake. In addition, the property also operated as a gasoline filling station from approximately 1929 through at least 1973. Circa 1995, the property was converted to multi-tenant commercial use and since that time has been occupied by various commercial/retail



occupants including various restaurants. Records indicate that six (6) underground storage tanks (USTs) containing petroleum products were removed from 125 Whalley Avenue prior to 1990.

129 Whalley Avenue was historically occupied by a residence until the early 1930s when it was converted to commercial use. From the early 1930s through approximately 1960, the property was used for offices and as headquarters for a plumbing company, operations unknown. The property was occupied by New Haven Chrysler-Plymouth Inc. Used Car Division, which performed both auto sales and auto repair services, in the early 1970s for an unknown amount of time. The property was then occupied by Acme Auto Body from approximately 1974 through at least 1980. Since the early 1990s, the property has been occupied by Aamity Car and Truck Rental which also performed repairs.

1.3 PREVIOUS SITE ASSESSMENT FINDINGS

Several environmental site assessment investigations (ESAs) have been completed at the Site including the following:

- Phase I Environmental Site Assessment (ESA), GZA, May 2016
- Phase II ESA, GZA, May 2016
- Supplemental Environmental Assessment, GZA, October 2016

Note the May 2016 Phase I and II ESAs included the neighboring 34-36 Sperry Street and 10-12 Dickerman Street properties, which are not included in this ABCA. Investigations of the Site by GZA in 2016 identified the following areas of concern (AOCs):

117-125 Whalley Avenue

- AOC-10 Historical property uses including automotive services
- AOC-11 Historical underground storage tanks (USTs)
- AOC-12 Suspect drain
- AOC-13 Potential fill

129 Whalley Avenue

- AOC-14 Inground hydraulic lifts
- AOC-15 Floor drain
- AOC-16 Oil storage
- AOC-17 Overhead doors
- AOC-18 Potential fill

The 2016 investigations of the Site included the exploration and analysis of soils from 19 soil borings and the sampling and analysis of groundwater from three monitoring wells installed at the Site (See Figure 2). The soil samples (one from each boring) were analyzed for extractable total petroleum hydrocarbons (ETPH). In addition, certain soil samples were also analyzed for volatile organic compounds (VOCs), polyaromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs) and the RCRA-8 metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver). See Table 1 in Appendix B. Three groundwater samples were analyzed for VOCs, PAHs, arsenic and lead. See Table 2 in Appendix B.

ETPH was detected in soil samples SB-1 (6-8) (842 mg/kg), SB-3 (6-8) (1,190 mg/kg) and SB-A (9-11) (541 mg/kg) at concentrations above the Residential Direct Exposure Criteria (R-DEC). In addition, arsenic (10.9 mg/kg) and the PAH



compound benzo(a)anthracene (1.04 mg/kg) were detected in soil sample SB-13 (0-2) at concentrations above their respective R-DECs.

The ETPH detected at sample locations SB-1, SB-3 and SB-A appeared to be related to a release from the inground hydraulic lifts (AOC-14) while the constituents in soil at sample location SB-13 appeared to be related to the presence of fill (AOC-13 and AOC-18).

No impacts to groundwater were detected.

January 2018 Hazardous Building Materials Assessment

In January 2018, GZA conducted a hazardous building materials (HBM) assessment for the buildings located at the Site¹. The major conclusions are as follows:

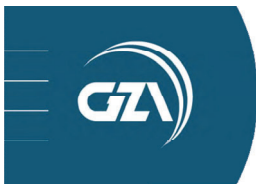
- **Asbestos:** The laboratory confirmed the presence of asbestos containing material (ACM) in roofing materials and pipe insulation at the Site. In the 117-125 Whalley Avenue building: asbestos was found in the roof above Music Haven, Whalley's Fish Restaurant, and in the roof above and basement beneath Papa John's Restaurant. In the 129 Whalley Avenue building: asbestos was confirmed in the main roof at up to 10% chrysotile, primarily found in the insulation block. Supplemental sampling for ACM containing materials was recommended at the 117-125 Whalley Avenue building after Papa John's Restaurant is vacated, allowing full access to the property.
- **Lead Paint:** Twelve paint chip samples were collected for analysis of lead. Lead was identified to be present in nine samples collected from the Site buildings. One sample was reported to contain lead at concentrations above 0.5% by dry weight, the level the USEPA and Connecticut defines a coating as a lead-based paint (LBP).
- **PCBs:** Four samples were collected from interior and exterior portions of the Site buildings. Analysis of those samples did not identify the presence of PCBs above laboratory reportable limits.

1.4 PROJECT GOAL – SITE REUSE PLAN

St Luke's Development Corporation's plans to redevelop the Site for residential use. Conceptually, the existing buildings and other structures on the property will be demolished and a new 5-story 50,000-square foot building would be constructed that would include affordable rental units on the upper floors and commercial space on the lower floor.

The goal of the redevelopment project is to increase affordable housing, homeownership rates, and community wellbeing in the area. The completed redevelopment will include a green space for the residents to enjoy, and the increased pedestrian traffic will benefit not only the new businesses but the established businesses in the area. A conceptual architectural plan for the property is presented in Appendix C.

¹ The 2018 assessment included the neighboring 34-36 Sperry Street and 10-12 Dickerman Street properties, which are not included in this ABCA



2.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

2.1 CLEANUP OVERSIGHT RESPONSIBILITY

The Site is not currently in a regulatory program. However, according to GZA's 2016 Phase I ESA, the 129 Whalley Avenue parcel appears to meet the definition of an "establishment" under the Connecticut Transfer Act because the property was occupied by an auto body shop between approximately 1974 and 1980². Therefore, if a qualifying transfer of the 129 Whalley Avenue parcel occurred, or if the Site were required to enroll in the CTDEEP Voluntary Remediation Program (VRP) as a condition to receive state or federal funding, the RSRs would apply. Under the Transfer Act or VRP programs, remediation of soil and/or groundwater would be overseen by a Connecticut Licensed Environmental Professional (LEP), unless CTDEEP determined otherwise. The hazardous materials abatement of the buildings would be conducted/overseen by a licensed abatement contractor.

2.2 LAWS, REGULATIONS AND STANDARDS APPLICABLE TO CLEANUP

As discussed above, the Site is not currently in a regulatory program; however, the Connecticut Department of Environmental Protection (CTDEEP) Remediation Standard Regulations, Sections 22a-133k-1 through 22a-133k-3, inclusive, of the Regulations of Connecticut State Agencies (RCSA) are the cleanup goals that are evaluated in this ABCA.

Because the Site is located within a GB-classified groundwater area, the RSR criteria that are potentially applicable to soils include the Direct Exposure Criteria (DEC) and the Pollutant Mobility Criteria (PMC), the Surface Water Protection Criteria (SWPC), and the Groundwater Volatilization Criteria (GW-VC). Descriptions of each of the criteria are presented below.

2.2.1 Direct Exposure Criteria (DEC)

In soil, compliance with DEC is evaluated through comparison of mass-based concentrations of contaminant constituents to established numerical criteria. The purpose of the DEC standard is to protect human health from risks associated with direct contact and/or ingestion of soil contaminants.

The DEC is applicable to soil within 15 feet of ground surface. Separate criteria are established for residential (R-DEC) and industrial/commercial (I/C-DEC) areas; however, use of the less stringent industrial/commercial criteria requires the owner of the property to place an environmental land use restriction (ELUR) on the land records that prohibits residential activities. The DEC do not apply to "inaccessible soils", which are defined as soils more than four feet below ground surface, two feet below qualifying pavement (>3-inches thick), or below an existing building, provided an ELUR prohibiting disturbance of the soils has been recorded for the whole parcel or the area of the release. Further, the DEC do not apply to polluted fill beneath qualifying pavement if such fill is polluted only with semi-volatile substances, petroleum hydrocarbons and metals (in concentrations not to exceed two times the applicable DEC) provided an ELUR is placed on the land records to prohibit disturbance of the soils in the subject area. Because redevelopment of the Site for residential use is proposed, the soil investigation results (Appendix B) were compared to the R-DEC.

² Any final opinion or determination as to whether a transaction is subject to the Connecticut Transfer Act is a legal one and advice of counsel should be obtained.



2.2.2 GB Pollutant Mobility Criteria (GB-PMC)

The purpose of the PMC is to protect underlying groundwater from impacts from contaminants leaching from impacted soils. For most constituents, this evaluation can be performed by either: 1) analyzing samples for total mass concentrations and comparing these results directly to PMC criteria presented in the RSRs, or 2) subjecting soil samples to the Synthetic Precipitation Leaching Procedure (SPLP) and analyzing the resulting extract, then comparing the results to the GWPC and/or PMC. The PMC do not apply to soils that are “environmentally isolated” (for example, below a building) provided an appropriate ELUR is in place, or to soil located below the seasonal high groundwater table in an area with a GB groundwater classification, such as the Site. In addition, the PMC do not apply to polluted fill on a parcel if such fill is polluted only with coal ash, wood ash, coal fragments, asphalt paving fragments or any combination thereof, public water is available, fill placement was not prohibited by law at the time and a few other conditions.

Because the Site is located in a Class GB area, the soil data summary table (Appendix B) provides the GB-PMC for comparison purposes.

2.2.3 Groundwater Volatilization Criteria (GWVC)

The purpose of the GWVC is to protect human health from risks associated with off-gassing of volatile compounds from contaminated groundwater and inhalation of those volatile vapors migrating through building slabs. Separate criteria are established for residential (R-GWVC) and industrial/commercial (I/C-GWVC) areas; however, use of the less stringent industrial/commercial standards requires the owner of a property to place an ELUR on the land records prohibiting residential activities. Because redevelopment of the Site for residential use is proposed, the groundwater results (Appendix B) were compared to the R-GWVC. However, as previously noted, no impacts to groundwater were identified.

2.2.4 Surface Water Protection Criteria (SWPC)

The purpose of the SWPC is to determine whether impacted groundwater that discharges to a surface water body might interfere with the attainment of surface water quality standards in that water body. The Site groundwater is inferred to eventually discharge to the West River, located approximately 1 mile southwest of the Site, therefore, groundwater the groundwater results (Appendix B) were compared to the SWPC. However, as previously noted, no impacts to groundwater were identified.

2.2.5 Groundwater Protection Criteria (GWPC)

The purpose of the GWPC is to protect human health from risks associated with consuming contaminated groundwater. The GWPC is a baseline criterion applicable to areas with GA groundwater classification; however, through Section 22a-133k-3(A)(3), the GWPC are also protective of existing untreated drinking water uses of groundwater in GB areas. Because the Site is located in a Class GB groundwater area and groundwater is not believed to be used for drinking purposes (or any other purposes), the GWPC is not applicable to the Site. Further, as previously noted, no impacts to groundwater were identified.



3.0 EVALUATION OF CLEANUP ALTERNATIVES

3.1 RELEASE AREAS REQUIRING REMEDIATION

Based on an evaluation of the data, GZA identified two release areas that require remediation of soil to achieve compliance with the RSRs as described below. The remedial areas are shown on Figure 2.

3.1.1 AOC-14 Inground Hydraulic Lifts

Three inground hydraulic lifts are located beneath the 129 Whalley Avenue building. At the time of GZA's 2016 investigations, the lifts were reportedly out-of-service. Sampling and analysis of soils at 14 soil borings in the area of the inground hydraulic lifts was completed in May and August 2016 and results confirmed ETPH in soil samples SB-1 (6-8') (842 mg/kg), SB-3 (6-8) (1,190 mg/kg) and SB-A (9-11) (541 mg/kg) at concentrations above the R-DEC (500 mg/kg) but below the GB-PMC (2,500 mg/kg).

3.1.2 AOCs-13 and 18 Fill

Previous investigations identified fill material consisting of sand with brick and asphalt at shallow depths beneath certain areas of the Site. The concentrations of arsenic (10.9 mg/kg) and the PAH benzo(a)anthracene (1.04 mg/kg) were detected in sample SB-13 (0-2) at concentrations above the R-DEC. Based on the RSR exemption for polluted fill discussed above in Section 2.4.2, compliance with the GB-PMC is not required, because the impacts are located in an area where a paved parking is proposed to be constructed during Site redevelopment, however R-DEC compliance must also be achieved.

3.2 CLEANUP ALTERNATIVES CONSIDERED

This section identifies various reasonable remediation alternatives that were considered in response to the environmental contamination issues identified at the Site. The following potential remedial alternatives were considered:

No Action. The "No Action" alternative is the option of not conducting any cleanup at the Site.

Excavation and Off-site Disposal. Excavation can be done using an excavator for impacted fill and soils. The waste material would be brought to a state permitted treatment/recycling facility or a solid or hazardous waste disposal facility.

Environmental Land Use Restriction (ELUR). The CTDEEP allows for polluted soils to remain in place provided they meet the definition of inaccessible soil and/or environmentally isolated soil and an ELUR has been recorded on the land records prohibiting disturbance of the soil and/or infiltration of water through the soil. Based on the proposed Site redevelopment, polluted soil within the footprint of the building to be constructed could be rendered inaccessible (and environmentally isolated, if such soils are identified) provided the ELUR prohibits the demolition of the building and floor slab and (if required) infiltration of precipitation into the soils. In other areas at the Site, soils could be rendered inaccessible under pavement (at least 3 inches thick) for fill polluted only with semi-volatile substances, petroleum hydrocarbons and metals (in concentrations not to exceed two times the applicable DEC), under pavement and two feet of clean soil or under at least four feet of clean soil, provided the ELUR prohibited the removal of the pavement and/or disturbance of the polluted soils. In the latter two cases, polluted soils at depths of less than two feet (if pavement is planned) or less than 4 feet (in areas planned for landscaping) would require excavation and off-site disposal as described above.



Often, a combination of soil excavation and application of ELURs is used to meet the goals of Site redevelopment.

Abatement of hazardous building materials and removal of inground hydraulic lifts prior to building demolition is included in the cleanup activities and would be completed according to State regulation and standard industry practices.

A summary of the cleanup alternatives for the remedial areas at the Site is provided in the table below:

Table 1- Summary of Remedial Alternatives Considered

Remedial Area	Soil Contaminants	Remedial Alternatives
AOC 14 - In ground hydraulic lifts at 129 Whalley Ave	ETPH >R-DEC	<ul style="list-style-type: none">• No action• Excavation and Off-site Disposal• No excavation; "cap" polluted soils with building and more than four feet below ground (exterior) and use an ELUR (Area A see Figure 2)• Combination of excavation and ELUR
AOC 13 and 18 Potential Fill	PAHs, Arsenic >R-DEC	<ul style="list-style-type: none">• No action• Excavation and Off-site Disposal• No excavation; relocate and "cap" polluted soils with building or clean soils pavement and use an ELUR (Area A and/or B see Figure 2)• Combination of excavation and ELUR
HBM: Ceilings of 117-125 and 129 Whalley Ave, and basement of 125 Whalley Ave	Asbestos	<ul style="list-style-type: none">• No action• Removal of HBM
HBM: Interior walls of 117-125 and 129 Whalley Ave	Lead Paint	<ul style="list-style-type: none">• No Action• Removal of Lead-based Paint• Demolish Building and conduct TCLP sampling to determine compliance

3.3 EVALUATION OF CLEANUP ALTERNATIVES AND COST ESTIMATES

3.3.1 Effectiveness

Alternative #1 - No Action: The "No Action" alternative is not an effective means of preventing exposure to human health or the environmental from the contamination at the Site.



Alternative #2 - Excavation and Off-site Disposal of Polluted Soils and Removal of Hazardous Building Materials: The removal of polluted soils and hazardous building materials is an effective way to permanently eliminate the source of and prevent exposure to the contamination. Abatement of HBM is necessary prior to the planned demolition of the existing Site buildings. Impacted soil source removal includes the excavation, loading, transportation and off-site disposal of contaminated soils. This alternative is proven, provides close to 100 percent certainty in its effectiveness, and allows for unrestricted use of the property, provided all impacted soil can be removed.

Alternative #3 – Leave Polluted Soils in Place Beneath Caps and Record an ELUR: Rendering polluted soil inaccessible using the proposed building and/or pavement is an effective way to prevent exposures through direct contact with the contaminated soil by creating a physical boundary through construction of an overlying building, qualifying paved surface or placement of clean soils of sufficient thickness. In addition, the planned constructed building will prevent infiltration of precipitation from contacting and leaching contaminants from underlying impacted materials (if any are identified above GB-PMC) and degrading Site groundwater quality. The overlying soils and structures would be preserved and maintained through the application of an ELUR on the Site land records to prohibit demolition of the building and/or pavement and disturbance of the underlying polluted soils.

Alternative #4 – Combination of Excavation and Use of an ELUR: A combination of soil excavation and application of ELURs can be an effective means of preventing exposure to human health or the environmental from the contamination at the Site and be a cost effective method to meet the goals of Site redevelopment.

3.3.2 Implementability

Alternative #1 - No Action: The “No Action” alternative requires no implementation.

Alternative #2 - Excavation and Off-site Disposal of Polluted Soils: This method will require removal, handling, disposal characterization, and transportation of contaminated soil and hazardous building materials to one or more facilities for disposal depending on the nature of the waste material. Abatement of HBM is necessary prior to the planned demolition of the existing Site buildings. Under this Alternative, the ETPH-impacted soils would be excavated and temporarily stockpiled onsite for waste characterization analysis and post-remediation confirmation soil samples would be obtained from the walls and floors of the excavated area and submitted for laboratory analysis to confirm remedial action goals have been achieved. Fill excavated during construction activities would be segregated, stockpiled and sampled for waste characteristics. Dependent on the analytical results, the stockpiled soils would be either be removed and transported to a permitted soil treatment/recycling facility or permitted landfill facility or reused on-site. Remaining excavated areas would be backfilled using clean borrow pit or quarried soils free of contaminants. It is anticipated that placement of clean backfill may be necessary in areas of soil removal. This is a relatively easy method to implement as no specialized equipment is required, and many qualified contractors are available to do the work.

Alternative #3 – Leave Polluted Soils in Place Beneath Caps and Record an ELUR: This alternative is relatively easy to implement and incorporate into the Site redevelopment plan. The implementation of an ELUR will require an A-2 survey demarcating the limits of the ELUR subject areas, analysis of a title search to identify interests in the land and potentially obtaining subordination agreements for those interests if necessary, the preparation and submittal of an ELUR application to the CTDEEP, and recording of the ELUR once approved on the land records. The ELUR would prohibit the demolition of the building, qualifying paved surfaces, removal of overlying clean soils and the disturbance of the underlying environmentally impacted soils and require an operations and maintenance plan specifying how the “caps” are maintained.



Alternative #4 – Combination of Excavation and Use of an ELUR: A combination of soil excavation, abatement of HBM materials, demolition of the existing Site buildings and application of ELURs can be a relatively easy method to implement for the reasons described above.

3.3.3 Preliminary Cost Estimates

These estimated costs are based on our professional judgment and experience with similar work undertaken in previous projects. The costs presented are approximate cost opinions and are provided for the purpose of evaluating alternative remedial programs. These estimates involve approximate quantity evaluations and quantities and unit costs may vary based on actual conditions encountered, future variations in market pricing, and other factors.

The preliminary opinion of cost includes only those cost items identified and should not be assumed to include other costs such as legal, administrative, permitting or others. The preliminary opinion of cost also does not include any costs with respect to third-party claims, fines, penalties, or other charges which may be assessed against any responsible party because of either the existence of present conditions or the future existence or discovery of any such conditions.

Alternative #1 - No Action: The "No Action" alternative will not have any cost implications.

Alternative #2 - Excavation and Off-site Disposal of Polluted Soils: The excavation of ETPH-impacted soils at AOC 14 would occur after the 129 Whalley Avenue building had been demolished and demolition materials removed and the in-ground hydraulic lifts have been drained of fluids and removed. Under this Alternative, the ETPH-impacted soils at AOC-14 and arsenic/PAH-impacted fill materials at AOC-13 would be excavated and temporarily stockpiled onsite for waste characterization analysis. In addition, all shallow fill excavated during Site redevelopment activities would be excavated, segregated, and stockpiled. Post-remediation confirmation soil samples would be obtained from the walls and floors of the excavated area and submitted for laboratory analysis to confirm remedial action goals have been achieved. Based on the results of waste characterization analyses, the stockpiled soils would either be reused on-Site or be removed and transported to a permitted soil treatment/recycling facility or permitted landfill facility and the excavated area would be backfilled using clean borrow pit or quarried soils free of contaminants. The proposed remedial area is shown in Figure 2. The associated cost of implementation of Alternative #2 is provided below.

Alternative #2 Excavation and Off-Site Disposal of Polluted Soils	Estimated Costs
Tasks	
Pre-Remedial Testing	\$12,000
Remedial Planning	\$5,000
Contractor Bidding/Selection/Contract Execution /Mobilization Activities	\$5,000
Soil Management Plan/Permitting	\$8,000
Field Oversight/Post-Remedial Sampling	\$25,000
Removal of In-Ground Hydraulic Lifts	\$20,000
AOC-14 Contracted Services-Soil Excavation/Disposal/Transportation/Laboratory Analysis (335 cubic yards/500 tons)	\$70,000 to \$100,000
AOCs-13/18 Contracted Services Soil Excavation/Placement/Regrading (1,500 to 2,000 tons)	\$82,500 to \$110,000
Soil Management Plan/Permitting	\$8,000



Alternative #2 Excavation and Off-Site Disposal of Polluted Soils	Estimated Costs
Tasks	
AOC-14 Clean Soil Backfill (500 tons)	\$18,000
HBM Abatement Costs	\$50,000 to \$60,000
Receptor Survey	\$2,500
Remedial Action Report	\$10,000
Verification Report	\$15,000*
Total Remediation Activities – Estimated Cost	\$331,000 to \$398,500

* Assumes based on current data that groundwater monitoring is not required for RSR compliance.

Alternative #3 - Rendering All Site Impacted Soil Inaccessible: Under this Alternative, all impacted soils and Site fill materials would be excavated, temporarily managed in stockpiles and tested for environmental constituents of concern (COCs) and dependent on test results would be moved, regraded and capped either below the proposed building (ELUR Subject Area A) or the paved parking areas and two feet of clean soils (ELUR Subject Area B), and rendered inaccessible through the application of an ELUR on those areas of the Site. Proposed ELUR remedial areas are shown in Figure 2. In addition, HBM from the planned demolition of the existing Site buildings would be removed and transported offsite to an appropriate permitted disposal facility. The associated cost of implementation of Alternative #3 is provided below.

Alternative #3 - Rendering All Site Impacted Soil Inaccessible or Environmentally Isolated	Estimated Costs
Tasks	
Pre-Remedial Testing	\$12,000
Remedial Planning	\$5,000
Contractor Bidding/Selection/Contract Execution /Mobilization Activities	\$5,000
Soil Management Plan/Permitting	\$8,000
Field Oversight/Characterization	\$25,000
AOCs-13/14/18 Contracted Services-Soil Excavation/Placement/Re-grading (1,500 to 2,000 tons)	\$82,500 to \$110,000
HBM Abatement Costs	\$50,000 to \$60,000
Removal of In-Ground Hydraulic Lifts	\$20,000
Preparation and Application of ELUR of Property Land Records	\$35,000
Receptor Survey	\$2,500
Remedial Action Report	\$10,000
Verification Report	\$15,000*



Total Remediation Activities – Estimated Cost	\$270,000 to \$307,500
--	-------------------------------

* Assumes based on current data that groundwater monitoring is not required for RSR compliance.

Alternative #4 – Combination of Excavation and Use of an ELUR: Under this Alternative, ETPH-impacted soils at AOC-14 would be excavated and transported to a permitted soil recycling facility or disposed at a permitted landfill. Impacted Site fill would be capped either below the proposed building (ELUR Subject Area A) or paved parking areas (ELUR Subject Area B), dependent on the nature and concentrations of COCs in the soils, and rendered inaccessible through the application of an ELUR on those areas of the Site. Proposed soil excavation and ELUR remedial areas are shown in Figure 2. The associated cost of implementation of Alternative #4 is provided below.

Alternative #4 Combination of Excavation and Use of an ELUR	Estimated Costs
Tasks	
Pre-Remedial Testing	\$12,000
Remedial Planning	\$5,000
Contractor Bidding/Selection/Contract Execution /Mobilization Activities	\$5,000
Soil Management Plan/Permitting	\$8,000
Field Oversight/Post-Remedial Sampling	\$25,000
Removal of In-ground Hydraulic Lifts	\$20,000
AOC-14 Contracted Services-Soil Excavation/Disposal/Transportation/Laboratory Analysis (500 tons)	\$70,000 to \$100,000
AOC-14 Clean Soil Backfill (500 tons)	\$18,000
AOCs-13 and 18 Contracted Services Excavation/Placement/Reg-grading Site Fill Materials (1,500 to 2,000 tons)	\$82,500 to \$110,000
HBM Abatement Costs	\$50,000 to \$60,000
Removal of In-Ground Hydraulic Lifts	\$20,000
Preparation and Application of ELUR of Property Land Records	\$35,000
Receptor Survey	\$2,500
Remedial Action Report	\$10,000
Verification Report	\$15,000*
Total Remediation Activities – Estimated Cost	\$378,000 to \$445,500

* Assumes based on current data that groundwater monitoring is not required for RSR compliance.

This cost range assumes up to of 500 tons of accessible impacted soils removed and the excavation, relocation and placement of up to 2,000 tons of impacted fill material to designated ELUR subject areas at the Site. The soil disposal costs were estimated at non-hazardous disposal. Actual costs would be based upon remediation contractor bids to be



obtained prior to implementation. The alternative costs do not include regulatory reporting requirements, programmatic and general project management, field contingencies and other applicable fees.

3.3.4 Recommended Cleanup Alternative

The recommended cleanup alternative is Alternative #4 Combination of Excavation and Use of an ELUR. Alternative #1: No Action cannot be recommended since it does not address risks posed by impacted soils identified at the Site. Alternative #2 is an effective method to mitigate potential exposures from polluted soil but the additional costs are not commensurate with the benefit to human health and the environmental that would be achieved compared to Alternatives 3 and 4. Alternative #3 could potentially be a less expensive option than Alternative #2, but the excavation and offsite transport and disposal of the most highly impacted soils from AOC-14 under Alternative #2 would be more effective in the mitigation of the potential risks posed by those soils and so would provide a greater level of protection to future site occupants and allow for a higher capitalization of the property, so for this reason, Alternative #4 is the recommended alternative.



Draft

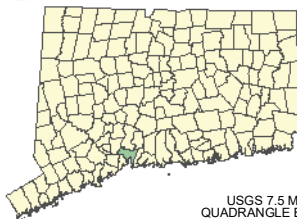
FIGURES



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GZA GeoEnvironmental, Inc.
Engineers and Scientists
www.gza.com



USGS 7.5 MINUTE
QUADRANGLE BASE MAP
NEW HAVEN, CONNECTICUT
1997

SITE LOCUS

34-36 SPERRY STREET AND 10-12 DICKERMAN STREET
NEW HAVEN, CONNECTICUT

Source: TOPO! maps are USGS topographic maps, Copyright: © 2011 National Geographic Society, i-cubed and are provided by arcgisonline.com.

PROJ MGR: ATH

REVIEWED BY: ATH

PROJECT NO. 05.0045791.00

DESIGNED BY: ATH

DRAWN BY: MJS

DATE: 05-16-16

THIS MAP HAS BEEN COMPILED FROM OTHER MAPS AND/OR SOURCES OF INFORMATION.
THIS MAP SHOULD NOT BE CONSTRUED AS A PROPERTY SURVEY, NOR USED FOR CONSTRUCTION PURPOSES.

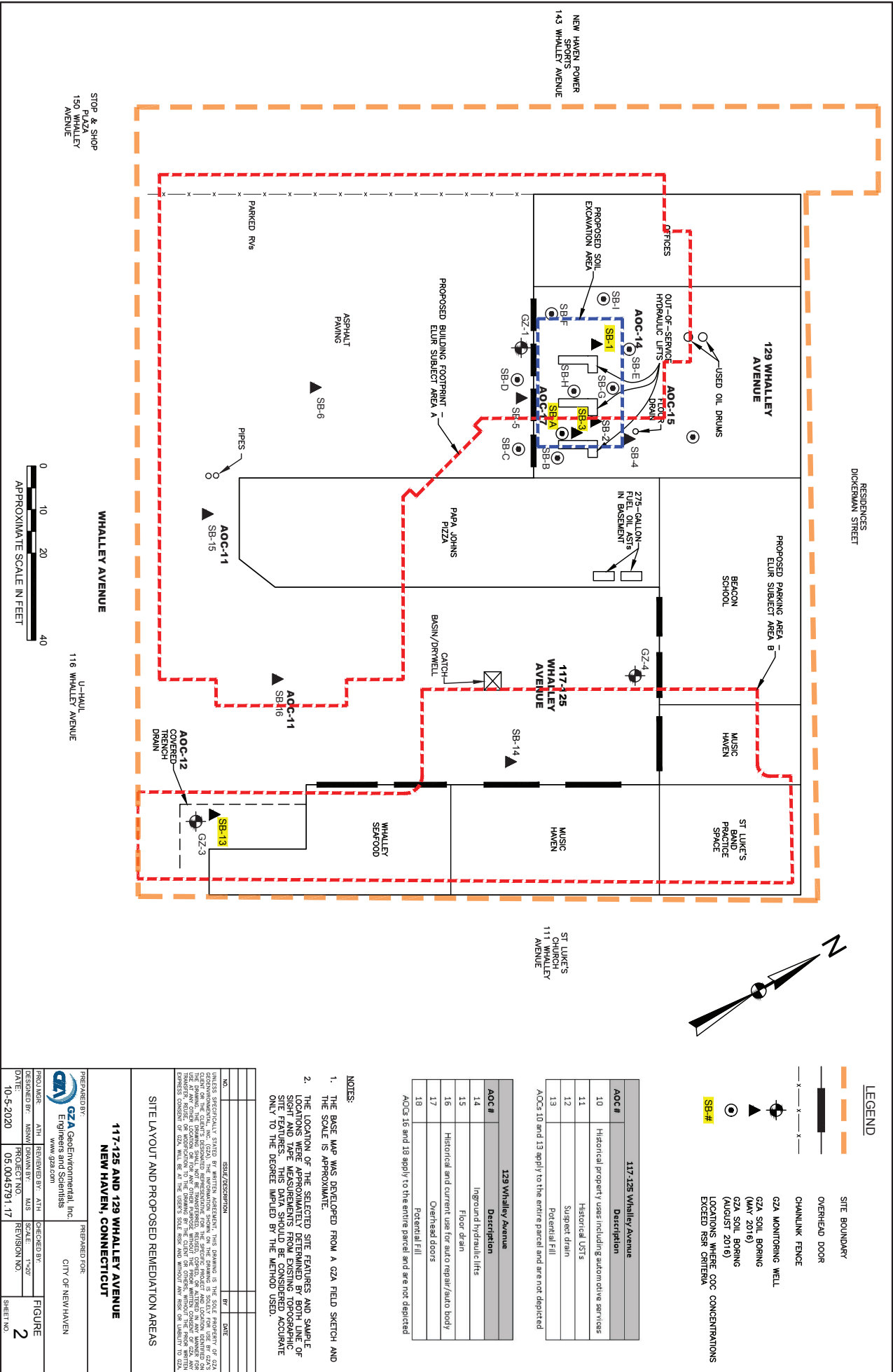
0 1,000 2,000 4,000 6,000 8,000

Scale in Feet



FIGURE

1





APPENDIX A
LIMITATIONS



USE OF REPORT

1. GeoEnvironmental, Inc. (GZA) prepared this Report on behalf of, and for the exclusive use of our Client at the stated time for the stated purpose(s) and location(s) identified in the Report. Use of this Report, in whole or in part, at other locations, or for other purposes, may lead to inappropriate conclusions; and we do not accept any responsibility for the consequences of such use(s). Further, reliance by any party not identified in the agreement, for any use, without our prior written permission, shall be at that party's sole risk, and without any liability to GZA.

STANDARD OF CARE

2. GZA's findings and conclusions are based on the work conducted as part of the Scope of Services set forth in the Report and/or proposal, and reflect our professional judgment. These findings and conclusions must be considered not as scientific or engineering certainties, but rather as our professional opinions concerning the limited data gathered during the course of our work.
3. GZA's services were performed using the degree of skill and care ordinarily exercised by qualified professionals performing the same type of services at the same time, under similar conditions, and at the same or a similar property. No warranty, expressed or implied, is made.

BASIS OF OPINION OF COST

4. GZA's opinion of cost is based on limited data which may not be sufficient to identify each and every condition existing at the site which may constitute noncompliance with applicable governmental statutes, rules, and regulations or constitute a release of oil or hazardous materials and/or may require remediation.
5. The costs on which the preliminary opinion of cost is based are limited to those conditions which were described in the Report.
6. Observations described in the Report were made under the conditions stated therein. Where access to portions of a structure or site was unavailable or limited, GZA renders no opinion as to the condition of those portions of the site or structure.
7. The conclusions presented in the Report were based solely upon the services described therein, and not on scientific tasks or procedures beyond the scope of described services or the time and budgetary constraints imposed by the Client.

COST ASSUMPTIONS

8. While the preliminary opinion of cost represents our professional judgment in this matter, actual conditions encountered during remediation may result in higher or lower costs.
9. The preliminary opinion of cost includes only those cost items identified, and should not be assumed to include other costs such as legal, administrative, permitting or others. The preliminary opinion of cost also does not include any costs with respect to third-party claims, fines, penalties, or other charges which may be assessed against any responsible party because of either the existence of present conditions or the future existence or discovery of any such conditions.
10. The Report contains approximate cost opinions for purposes of evaluating alternative remedial programs. These estimates involve approximate quantity evaluations. Actual quantities and unit costs may vary. A preliminary cost opinion of this nature is likely to vary substantially from Contractors' Bid Prices and is not to be considered the equivalent of nor as reliable as Contractors' Bid Prices. Prices for similar work undertaken in the future will be subject to variations



in market pricing, which are not within GZA's control. Detailed quantity and cost estimating should be performed by professional, experienced cost estimators to determine actual cost.

RELIANCE ON INFORMATION PROVIDED BY OTHERS

11. In preparing the Report, GZA may have relied on certain information provided by the Client, state and local officials, and other parties referenced therein available to GZA at the time of the evaluation. GZA did not attempt to independently verify the accuracy or completeness of all information reviewed or received during the course of this evaluation.

CODES AND REGULATIONS

12. GZA used reasonable care in identifying and interpreting codes and regulations which are relevant to the costs estimated. These codes and regulations are subject to various, and possibly contradictory, interpretations. Compliance with codes and regulations by other parties is beyond our control.
13. Governmental agencies' interpretations, requirements, and enforcement policies vary from region to region, district office to district office, from state to state, and between federal and state agencies. In addition, statutes, rules, standards, and regulations may be legislatively changed and inter-agency and intra-agency policies may be changed from present practices. GZA has used its experience and judgment in making assumptions as to how anticipated changes in regulatory policies may affect remediation costs.

ADDITIONAL SERVICES

14. It is recommended that GZA be retained to provide engineering services during any final design, construction and/or implementation of any remedial measures recommended in this report. This will allow us the opportunity to: i) observe conditions and compliance with our design concepts and opinions; ii) allow for changes in the event that conditions are other than anticipated; iii) provide modifications to our design; and iv) assess the consequences of changes in technologies and/or regulations.



APPENDIX B
2016 DATA SUMMARY TABLES

Table 1
Summary of Soil Analytical Results 2016
CZA Job #: 45791.01

Sample Location (feet below grade)	CT NRSs	SP-1 (6-8)																			
		SP-2 (6-8)	SP-3 (6-8)	SP-4 (1-2)	SP-5 (0-2)	SP-6 (1-3)	SP-13 (0-2)	SP-14 (0-2)	SP-15 (8-10)	SP-16 (8-10)	SP-A (9-11)	SP-B (6-8)	SP-C (6-8)	SP-D (6-8)	SP-E (6-8)	SP-F (6-8)	SP-G (6-8)	SP-H (6-8)	SP-I (6-8)		
Sample Date	R-DEC	GB-PMC																			
Metals (mg/kg)																					
Ascent	10	NA	NT	NT	NT	6.58	11.1	2.78	10.9	9.47	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Barium	4700	NA	NT	NT	NT	35.3	71.4	55.8	32.3	38	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Cadmium	34	NA	NT	NT	NT	NO<0.45	0.52	NO<0.52	NO<0.43	NO<0.51	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Chromium	100	NA	NT	NT	NT	8.39	13.1	6.92	8.06	11.9	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Lead	200	NT	NT	NT	NT	55.5	366	317	95.7	24.1	NO<0.59	15.4	NT	NT	NT	NT	NT	NT	NT	NT	
Mercury	40	NA	NT	NT	NT	0.149	0.392	0.112	0.337	0.232	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
SP-P Metals (mg/L)																					
Acetone	NA	0.50	NT	NT	NT	NT	NO<0.025	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Lead	NA	0.15	NT	NT	NT	0.093	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
PCBs (mg/kg)																					
PCB-1254	1	0.005	0.157	NT	NT	NO<0.0521	NO<0.0533	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
PCB-1254	500*	28	NT	NT	NT	NO<0.0557	NT	NT	NT	NO<0.0552	NT	NO<0.0045	NO<0.0046	NT	NT	NT	NT	NT	NT	NT	
PCB-1254	2000	56	NT	NT	NT	NO<0.0557	NT	NT	NT	NO<0.0552	NT	NO<0.0045	NO<0.0046	NT	NT	NT	NT	NT	NT	NT	
SP-2 (6-8) (mg/kg)																					
PCB-1254	500*	28	NT	NT	NT	NO<0.0557	NT	NT	NT	NO<0.0552	NT	NO<0.0045	NO<0.0046	NT	NT	NT	NT	NT	NT	NT	
PCB-1254	2000	56	NT	NT	NT	NO<0.0557	NT	NT	NT	NO<0.0552	NT	NO<0.0045	NO<0.0046	NT	NT	NT	NT	NT	NT	NT	
SP-3 (6-8) (mg/kg)																					
PCB-1254	500*	28	NT	NT	NT	NO<0.0557	NT	NT	NT	NO<0.0552	NT	NO<0.0045	NO<0.0046	NT	NT	NT	NT	NT	NT	NT	
PCB-1254	2000	56	NT	NT	NT	NO<0.0557	NT	NT	NT	NO<0.0552	NT	NO<0.0045	NO<0.0046	NT	NT	NT	NT	NT	NT	NT	
SP-4 (1-2) (mg/kg)																					
Anthracene	1000	400	NT	NT	NT	NT	NO<0.352	NT	0.48	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Benz(a)anthracene	1	1	NT	NT	NT	NT	0.85	NT	1.04	NO<0.35	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Benz(b)fluorene	1	1	NT	NT	NT	NT	0.51	NT	0.806	NO<0.176	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Benz(b)fluoranthene	1	1	NT	NT	NT	NT	0.64	NT	0.871	NO<0.35	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Benz(k)fluorene	8+4*	1*	NT	NT	NT	NT	0.435	NT	0.543	NO<0.35	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Benz(k)fluoranthene	1	1	NT	NT	NT	NT	0.435	NT	0.449	NO<0.35	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Chrysene	8+4*	1*	NT	NT	NT	NT	0.533	NT	1.03	NO<0.176	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Dibenz(a,h)anthracene	1*	1*	NT	NT	NT	NT	0.104	NT	0.233	NO<0.179	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Fluoranthene	1000	56	NT	NT	NT	NT	0.928	NT	2.42	NO<0.35	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Indol(1,2,3-cd)pyrene	1*	1*	NT	NT	NT	NT	0.363	NT	0.509	NO<0.35	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Perylene	1000	40	NT	NT	NT	NT	NO<0.352	NT	1.9	NO<0.35	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
Pyrene	1000	40	NT	NT	NT	NT	0.766	NT	1.62	NO<0.35	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
SP-5 (0-2) (mg/L)																					
Phenanthrene	NA	40.00	NT	NT	NT	NT	NT	0.09	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	
SP-6 (1-3) (mg/kg)																					
CHBEP ETHP (mg/kg)	500*	2500*	842	26.8	1190	NO<2.18	28.4	48.3	115	NO<2.3	NO<12	NO<19.8	541	NO<19.7	72.4	355	NO<21	NO<20	NO<2.14	NO<2.16	36.4

Table 2
Summary of Groundwater Analytical Results
GZA Job #: 45791.00

Sample ID	CT RSRs			DUP	GZ-1	GZ-3	GZ-4
	Sample Date	SWPC	R-GWVC	I/C-GWVC	5/13/2016	5/13/2016	5/13/2016
Metals (ug/L)							
Lead	13	NE	NE	ND< 10.0	ND< 10.0	ND< 10.0	ND< 10.0
Arsenic	4	NE	NE	ND< 2.5	ND< 2.5	ND< 2.5	ND< 2.5
VOCs 8260B (ug/L)							
VOCs	Varies			ND< 1.0	ND< 1.0	ND< 1.0	ND< 1.0
SVOCs 8270 (ug/L)							
SVOCs	Varies			ND< 0.19	ND< 0.19	ND< 0.19	ND< 0.19

Notes:

ND = indicates Non Detected above the laboratory reporting limit.

NE = indicates standard Not Established

1. All samples collected by GZA and analyzed by ESS Laboratories, Cranston, RI
2. RSRs = Connecticut Remediation Standard Regulations (2013)
3. SWPC = Surface Water Protection Criteria
4. R-GWVC = Residential Groundwater Volatilization Criteria
5. I/C-GWVC = Industrial/Commercial Groundwater Volatilization Criteria



APPENDIX C
ARCHITECT'S CONCEPTUAL PLAN

This drawing is not to be reproduced or used for any other project without the written consent of Paul B. Bailey Architect, LLC. The drawing and any other information contained herein are the property of the architect and may be used for the design of the project only. Any other use or reproduction without the written consent of the architect is prohibited.

PROJECT:
**ST. LUKES
AFFORDABLE HOUSING
DEVELOPMENT
117 WHALLEY AVENUE
NEW HAVEN, CT**

DATE	DESCRIPTION

FIGURE:
SCHEMATIC DESIGN

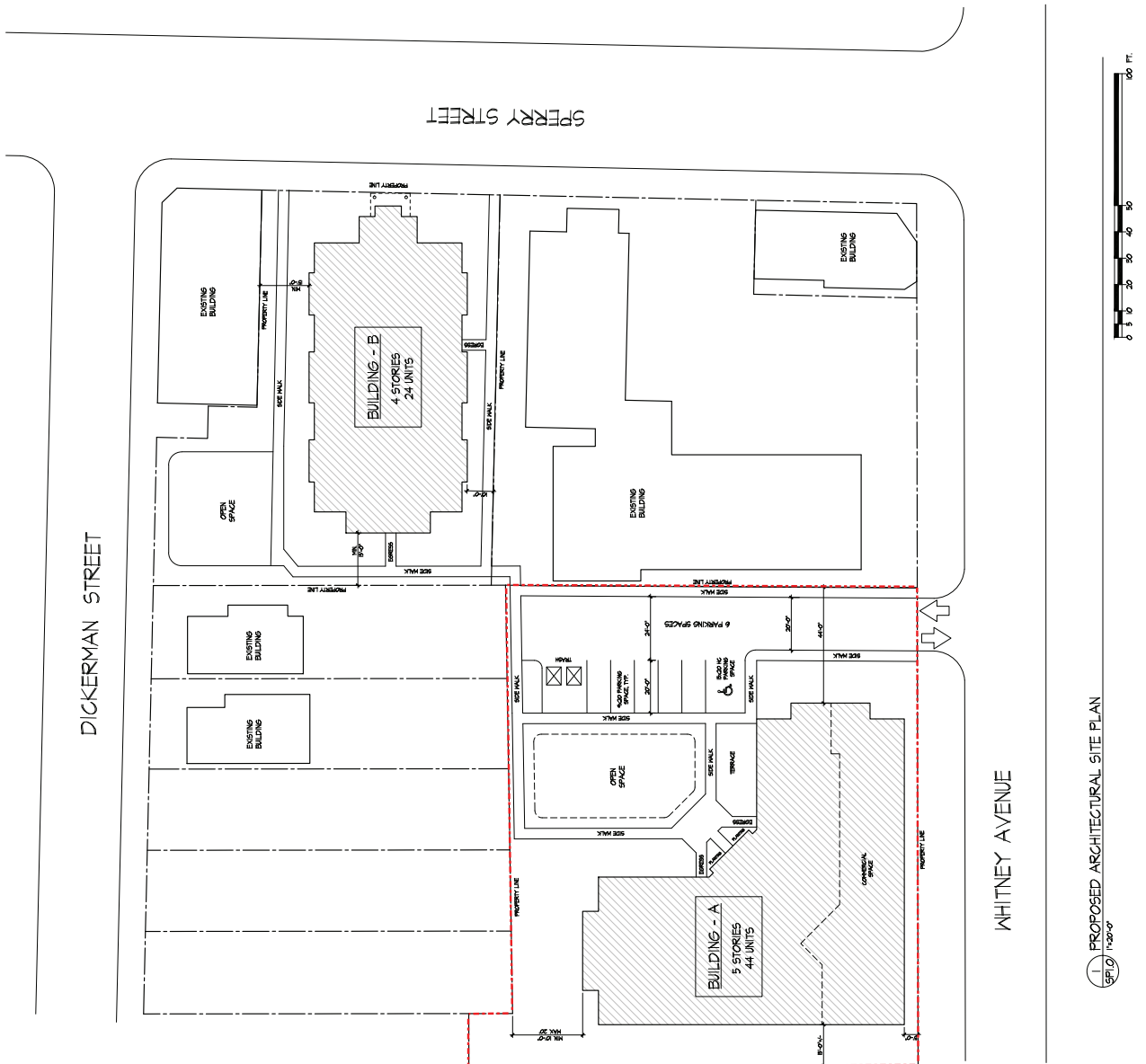
**PAUL B. BAILEY
ARCHITECT •**
10 AUDUBON STREET
NEW HAVEN, CONNECTICUT 06510
203 • 776 • 8888 F 203 • 772 • 5546

DATE: 10-01-2020
SCALE: AS NOTED
JOB NO. 20-041

DESIGNED BY: PB
CHECKED BY: PB
DATE: 10-01-2020

**PROPOSED ARCHITECTURAL
SITE PLAN**

SP10



PROPOSED ARCHITECTURAL SITE PLAN



**PROPERTY BOUNDARY
117-125 & 129 Whalley Ave**



GZA GeoEnvironmental, Inc.

THRESHOLD CRITERIA - ATTACHMENT C
St. Luke's Development Corporation
Copy of Community Notification Ad



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Latest Updates

SLDC is seeking public comment and input on the Draft FY 20-21 Application to the Environmental Protection Agency's Brownfield Clean Up Grant, including the Analysis of Brownfield Grant Alternatives (ABCA), specifically to address the receipt of funding to conduct environmental remediation for the parcels of land at 117-125 and 129 Whalley Avenue, New Haven, Connecticut. St. Luke's will conduct a Virtual Public Meeting on October 19, 2020 beginning at 6:00 pm and ending when all attendees have had an opportunity to comment. If you or your organization is interested in participating in the Virtual Public Meeting, please send an email to sldcepagrant@gmail.com with "Virtual Public Hearing – Brownfield Cleanup Grant" in the "Subject" line. An e-mail link will be sent to all registered participants using the Zoom application.

The draft ABCA document is posted [here](#) for your review. Please feel free to send all questions, comments, concerns, or complaints relating to this grant application or the ABCA document to sldcepagrant@gmail.com



Valley Independent Sentinel La Voz Hispana



NOTICE OF VIRTUAL PUBLIC MEETING AND COMMENT PERIOD

by **STAFF** | Oct 2, 2020 1:04 pm

Commenting has been closed | [E-mail the Author](#)

Posted to: [Legal Notices](#), [Other](#)

St. Luke's Development Corporation Draft FY 20-21 Application to the Environmental Protection Agency's Brownfield Clean Up Grant.

A twenty-three (23) day public-examination and comment period will begin on Monday, October 5, 2020 and end on October 28, 2020. St. Luke's Development Corporation is seeking public comment and input on the Draft FY 20-21 Application to the Environmental Protection Agency's Brownfield Clean Up Grant, including the Analysis of Brownfield Grant Alternatives (ABCA), specifically to address the receipt of funding to conduct environmental remediation for the parcels of land at 117-125 and 129 Whalley Avenue, New Haven, Connecticut. This grant must be used to carry out cleanup activities on brownfield sites, defined in CERCLA § 101(39) as property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of hazardous substances, pollutants, contaminants, controlled substances, petroleum or petroleum products, or is mine-scarred land. St. Luke's will conduct a VIRTUAL PUBLIC MEETING on October 19, 2020 beginning at 6:00 pm and ending when all attendees have had an opportunity to comment. If you or your organization is interested in participating in the VIRTUAL PUBLIC MEETING, please send an email to sldcepagrant@gmail.com with "Virtual Public Hearing – Brownfield Cleanup Grant" in the "Subject" line. An email link will be sent to all registered participants using the Zoom application. St. Luke's will also accept electronic comment on the draft application through October 28, 2020 at sldcepagrant@gmail.com. For copies of the Draft Application and related materials, please refer to St. Luke's website, <https://www.sldcct.org/> under NEWS or you may request a copy via email at the above address. Questions, concerns, complaints or requests for information in alternative formats must be directed to Anika Singh Lemar at (203) 432-4022 or sldcepagrant@gmail.com.

Share this story with others.



ROOMS FOR RENT

LARGE SPACIOUS 2 Bedroom apt hardwood floors and walk-in closets. Heat and hot water included \$1400/mo. Monthly for move-in. On bus line Beaver Hills, SCSU, YALE area. Mr. Johnson-203-710-1630

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NEW HAVEN 3 BR, Hardwood, new appliances, remodeled bath and kitchen, parking, large rooms, quiet area, security, references, and credit check \$1,300/mo 475-235-5229

NEW HAVEN Farmen Avenue, 2 BR apt, 1 BA, LG kitchen, LR, DR, Hardwood floors, on the bus line require at 203-786-6240

NEW HAVEN: 472 Quinipiac Ave., 2BD, OSP, storage, waterfront prop., avail. now, \$900/mo, 1.5mo sec. w/ref., 203-916-2103

SPACE FOR RENT on Seymour Woodbridge Town Line, 15x10, 15x20, 15x30 with lights, text 203-736-4238

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Great 4 Storage Single Bay Garage Brick w/steel garage door, elec & lights. \$195/mo, Barnett St., New Haven, 2 min to Merritt at I-95 203-268-3876

MILFORD GARAGE: for rent in industrial area, about 2,000 sq ft. w/2 overhead doors. \$1200/mo. Call Joe 203-619-3447

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2014 SUBARU Crosstrek X5 Hybrid, 40k miles, new tires, asking \$16,000 call 203-671-6957

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Jags, Benz, Healis, Cadills, Porshes, Lotis, Ford, Chevy, MG, Triumph, Harleys and others basic, keelcases, projects and rotted, running or not. Cash waiting. Old & new 203-689-6860

VEHICLES WANTED

CASH PAID FOR ANY TOYOTA OTHER MAKES ANY CONDITION
Running or not. Body & engine ok. (203)900-4431

BOATS & ACCESSORIES

16 FOOT aluminum center console, Evinrude motor and galvanneal trailer. Needs ignition switch, \$1000 OBO, 860-635-4571

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8, 10, 15 & 20 Yard Dumpsters Available

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HOD\$170

★ ★ ★

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Call For Today's Lowest Price
203-467-2220
★ Accepts Charge Cards ★
★ HOD \$477 ★

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Lic #570353, Fully Insured.

PUBLIC NOTICES

LEGAL NOTICE
CONNECTICUT LOTTERY CORPORATION
NOTICE OF EXPIRING \$2.2 MILLION LOTTO PRIZE

The Connecticut Lottery Corporation ("CLC") hereby gives notice that 10/21/2020, is the last day to claim the \$2.2 million prize drawn in the 4/24/2020 LOTTO drawing. The winning LOTTO numbers drawn on 4/24/2020 were 2-7-8-12-17-24. The winning ticket was sold at Hamden Shell, 1994 Whitney Ave., Hamden, CT. To timely claim the prize(s), on or before 4/24/2020, go to a CT Lottery Retailer or CT Lottery Headquarters, 777 Brook St., Rocky Hill, CT. A CT Lottery Retailer or CT Lottery Headquarters will validate your ticket through their terminal. Winning tickets \$50,000 or larger must be claimed at CT Lottery Headquarters. CT Lottery Headquarters business hours: Mon. - Fri., 8:30am - 4:30pm, closed Saturday and Sunday. The CT Lottery Headquarters will be closed on 10/12/2020.

NOTICE OF VIRTUAL PUBLIC MEETING AND COMMENT PERIOD

St. Luke's Development Corporation Draft FY 20-21 Application to the Environmental Protection Agency's Brownfield Clean Up Grant.

A twenty-three (23) day public-examination and comment period will begin on Monday, October 5, 2020 and end on October 28, 2020. St. Luke's Development Corporation is seeking public comment and input on the Draft FY 20-21 Application to the Environmental Protection Agency's Brownfield Clean Up Grant, including the Analysis of Brownfield Grant Alternatives (ABCA), specifically to address the receipt of funding to conduct environmental remediation for the parcels of land at 117-125 and 129 Whalley Avenue, New Haven, Connecticut. St. Luke's will conduct a VIRTUAL PUBLIC MEETING on October 19, 2020 beginning at 6:00 am and ending when all attendees have had an opportunity to comment. If you or your organization is interested in participating in the VIRTUAL PUBLIC MEETING, please send an email to slc@seagrantinc.com with the subject line "Virtual Public Hearing - Brownfield Cleanup Grant" in the "Subject" line. An email link will be sent to all registered participants using the Zoom application. St. Luke's will also accept electronic comment on the draft application through October 28, 2020 at <https://www.sldc.org/> under NEWS or you may request a copy via email at the above address. Questions, concerns, complaints or requests for information in alternative formats must be directed to Anika Singh Lemar at (203) 432-4022 or slc@seagrantinc.com.

PUBLIC NOTICES

NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

Date of Notice: October 5, 2020
Name of Responsible Entity: City of New Haven Health Department
Address: 54 Meadow Street
City, State, Zip Code: New Haven, CT 06519
Telephone Number of RE: Maritza Bond, Acting Program Director, 203-946-6978
On or after October 13, 2020 the City of New Haven Health Department will submit a request to the U.S. Department of Housing and Urban Development (HUD) for the release of the Lead-Based Paint Hazard Control Grant Program (LBPCH) is authorized by Section 1011 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act of 1992, 42 U.S.C. 4852) and funding is provided by the Consolidated Appropriations Act, 2019 (Pub. Law 115-141), approved March 23, 2019, and the Consolidated Appropriations Act, 2019 approved February 15, 2019, (Public Law 116-16). The Healthy Homes Supplemental funding is authorized under Section 502 of the Housing and Urban Development Act of 1970 (12 U.S.C. 1701z-2), with funding approved by the same Appropriations Acts, for the following multi-year program/project: SLTHD0322-19, Lead-Based Paint Hazard Control program and Healthy Homes Supplemental grant in the amount of \$5,600,000 for the abatement of lead hazards from the homes of families and children. Each year, the department notifies homeowners who require lead hazards abatement of their privately-owned rental units in writing. It is these units and these landlords whom we seek to assist financially as a main priority because their properties were identified as housing a lead poisoned child or as a serious lead hazard to children in the City of New Haven. Specifically, the program focuses on single and multi-family units that house children. The primary purpose of the program is to reduce the exposure of young children to lead based paint hazards in their homes. Eligible property owners will be offered a five-year forgivable loan of up to \$9,981.67 per unit for lead hazard control as identified in the City's lead abatement plan. Loans are 0% interest for a 5-year term and forgiven at the rate of 20% per year through the term of the loan. Property owners will be responsible for any costs of abatement in excess of the loan amount. The City of New Haven Health Department is requesting the release of \$5,600,000 with a match of \$560,286.80 to support the Lead Hazard Reduction Grant Program.

The proposed hazard control activities to be funded under this/these program(s) is/are categorically excluded from the environmental, environmental Policy Act requirements, subject to compliance with some of the environmental laws and authorities listed at § 5.8 of 24 CFR Part 58. In accordance with §58.15, a tiered review process has been structured, whereby some environmental laws and authorities have been identified for the intended targeted areas listed above. Other applicable environmental laws and authorities will be complied with when individual projects are ripe for review.

Funds are used to provide inspections, evaluation and abatement of lead-based hazards in residential units occupied by children with elevated blood levels; units occupied by children under the age of six; and/or units to be rented to families with children under the age of six. Funds will be used to provide lead safe housing as part of renovation of vacant and blighted housing by not-for-profit affordable housing developers.

Specifically, the target area(s) have been studied and are in compliance with the following laws and authorities required to achieve the Tier 1 review: Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6, etc. Site-specific environmental reviews will include compliance with the following environmental laws and authorities for proposed projects funded under the program(s) listed above: Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities listed at §58.5-58.35(a)(ii). Should individual agree projects exist and the three-year old for categorical exclusion detailed at §58.35(a), an Environmental Assessment will be completed and a separate Finding of No Significant Impact and Request for Release of Funds published. Copies of the compliance documents and the assessment are available at the address below.

An Environmental Review Record (ERR) that documents the environmental determinations for this project, and more fully describes the tiered review process cited above, is on file at the City of New Haven Health Department, 54 Meadow Street, 9th Floor, New Haven, CT 06519 and may be examined or copied weekdays 9 a.m. to 5 p.m.

PUBLIC COMMENTS
Any individual, group, or agency may submit written comments on the ERR to the City of New Haven Health Department. All comments received by October 12, 2020 will be considered by Director of the City Plan Department City prior to authorizing submission of a Request for Release of Funds and Environmental Certification to HUD. Comments may be directed to Aicha Woods, Director of City Plan, at awoods@newhavenct.gov.

RELEASE OF FUNDS
The Maritza Bond, Director of Health of the City of New Haven Health Department certifies to HUD that Aicha Woods, Director of City Plan, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the City of New Haven Health Department to utilize federal funds and implement the Program.

OBJECTIONS TO RELEASE OF FUNDS
HUD will consider objections to its release of funds and the City of New Haven Health Department certification for a period of fifteen days following either the anticipated submission date (cited above) or HUD's actual receipt of the request (whichever is later) only if the objections are one of the following: (a) that the certification was not executed by the Certifying Officer of the City of New Haven Health Department (b) the City of New Haven Health Department has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR Part 58; (c) the City of New Haven Health Department has committed funds or incurred costs not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58), and may be addressed to HUD and sent to the email address as follows: Karen M. Griego, Office of Lead Hazard Control and Healthy Homes, Program Environmental Clearance Officer, U.S. Department of Housing and Urban Development LeadRegulations@HUD.GOV. Potential objectors may contact HUD directly by October 23, 2020, the last day of the objection/comment period.

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PUBLIC NOTICES

LEGAL NOTICE

After 59 years in general family practice medicine Dr Harold D. Levy of Branford plans to retire on November 1, 2020. Copies of patients' medical records can be obtained from his office until January 1, 2021.

Notice of Tentative Determination to Approve an Application for Dam Safety Permit & Water Quality Certification and Intent to Waive Public Hearing

Applicant(s): Roger and Mary Ellen Simon
Application Nos: DS-201914192 & WQC-201912190
City/Town: Bethany

Dam Name & DEEP ID No: West River Pond Dam, #804, BB (Moderate) Hazard

The Commissioner of the Department of Energy and Environmental Protection ("DEEP") hereby gives notice that a tentative determination has been reached to approve the following applications. The Commissioner also intends to waive the requirement for public hearing pursuant to Section 22a-403 of the Connecticut General Statutes (CGS) provided that a hearing may be held for the dam safety permit if the Commissioner determines that the public interest will best be served thereby, or shall hold a hearing upon receipt of a petition as described below.

Application No.: DS-201914192 & WQC-201912190
Applicant's Name and Address: Roger and Mary Ellen Simon
63 Downs Road
Bethany, CT 06105
Contact Name/Phone No/Email: Roger and Mary Ellen Simon, MaryEllenSimon@sbglobal.net, 203-393-1288
Type of Permit: New Permit
Dam Safety & Water Quality Certification
Relevant Statute(s)/Regulation: 22a-403 & 22a-426 of the CGS
Section 401(a)(1) of the Federal Clean Water Act
Project Description: Repair/Modify an existing dam
Project Location: The West River Pond Dam is located on the property at 63 Downs Road, Bethany, CT.
West River Pond & West River
Water(s):
REGULATORY CONDITIONS
The proposed dam improvements consist of: installing a new sluice gate on the upstream side of the dam at the penstock opening. The old deteriorated piping will be replaced and the portion of the piping through the dam will be slip-lined. The new gate will be mounted on a new upstream concrete wall poured between the existing upstream training walls. A new trash rack will also be installed at this location. Additionally, the old low level drawdown structure will be made operable again by building a new concrete drawdown structure around the existing sluice invert and installing a new sluice gate inside this new concrete structure. This structure will be equipped with wear board and a trash rack and be operable from the top of the structure with a T handle. To address the additional seepage through the dam, a concrete cutoff wall will be constructed directly upstream of the existing dam that will extend to the bottom of the dam. Other work proposed includes replacing all missing masonry on the downstream face, supplementing the existing riprap in the stilling basin downstream, clearing the trees at both dam abutments, and replacing and repointing mortar as necessary. The activity will have the following impacts on the West River:
Temporary impacts total 175 square feet.
Permanent impacts total 1,360 square feet.

Application number WQC-201914190 has been evaluated for compliance with the applicable provisions of sections 301, 302, 303, 306 and 307 of the Federal Clean Water Act and the Water Quality Standards and Criteria of the State of Connecticut adopted pursuant to Section 22a-426 of the CGS.

INFORMATION REQUESTS/PUBLIC COMMENT
This application has been assigned Nos. DS-201914192 & WQC-201912190; please use these numbers when corresponding with DEEP regarding this application. Interested persons may obtain copies of the application from the applicant at the above address. Due to the ongoing COVID-19 virus pandemic, the Department of Energy and Environmental Protection located at 79 Elm Street, Hartford, CT is closed to the public until further notice. However, electronic copies of the application and supporting documentation can be provided to interested persons via email. Any such requests for electronic documents may be directed to Dan Lesniewski of the Dam Safety Section at 860-424-3384 or Daniel.Lesniewski@ct.gov.

Before making a final decision on this application, the Commissioner shall consider written comments on the application from interested persons. Written comments on the application should be directed to Dan Lesniewski via electronic mail to: Daniel.Lesniewski@ct.gov no later than thirty (30) days from the publication date of this notice. Written comments may also be submitted in paper form to the Department of Energy and Environmental Protection located at 79 Elm Street, Bureau of Water Protection and Land Reuse/Hartford, CT. In this submittal please identify the name of the staff assigned to the application, the permit application number and your phone number and/or email address to facilitate responses to your comments. Due to the COVID-19 virus Pandemic and social distancing measures implemented by DEEP staff, there could be delays in the response to your comments. You may contact the staff person identified in this notice with any questions you may have.

PETITIONS FOR HEARING
The Commissioner may conduct a public hearing if the Commissioner determines that the public interest will best be served thereby, or shall hold a hearing upon receipt of a petition signed by at least twenty-five persons. Petitions for a hearing shall be submitted within thirty (30) days from the date of publication of this public notice and should include the application number noted above and also identify a contact person to receive notifications. Petitions may also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. In order to facilitate the filing of requests for hearing during the COVID-19 emergency and consistent with the Department's Temporary Directive, the Office of Adjudications will accept electronically-filed petitions in addition to petitions submitted by mail. Petitions with required signatures may be filed by email to the Office of Adjudications at deep.adjudications@ct.gov or mailed to the DEEP Office of Adjudications, 79 Elm Street, Hartford, CT 06106. Within thirty (30) days, original petitions that were filed electronically must also be mailed to the Office of Adjudications at the above-noted address. If the original petition exists only in electronic format or signatures were produced using a computer or typewriter, the petition must be submitted with a statement bearing the wet-ink signature of the petitioner that the petition is only available in that format and has been submitted to satisfy the requirement that an original petition be filed. Additional information can be found at <https://portal.ct.gov/DEEP/Adjudications/Office-of-Adjudications>.

/s/Jennifer L. Perry
Jennifer L. Perry
Director
Water Planning and Management Division
ADA PUBLICATION STATEMENT
The Connecticut Department of Energy and Environmental Protection is an Affirmative Action and Equal Opportunity Employer that is committed to complying with the Americans with Disabilities Act. To request an accommodation contact us at (860) 418-5910 or deep.accommodations@ct.gov.

Did you know?

According to the high-quality ground beef purveyor Schweid & Sons, the most common ground beef choice among burger chefs is 80 percent lean, 20 percent fat. Law prohibits the sale of any ground beef with a fat content above 30 percent. While some consumers may scoff at the notion of buying beef that's 20 percent fat, Schweid & Sons notes that the fat that surrounds the meat gives it a rich, juicy flavor. In fact, Schweid & Sons says that beef with lower-fat compositions, such as 85 percent lean and 15 percent fat, tends to dry out fast, which can adversely affect the flavor of the burger. 7/19/12cs

THRESHOLD CRITERIA - ATTACHMENT D
St. Luke's Development Corporation
Meeting Screenshots & Minutes
Meeting Participant List
Comments Received & Responses

zoom.us Meeting View Edit Window Help Zoom Meeting

Nicole Cabanez

Recording

F2 SITE LO-2 (1).pdf - Nuvo's Power PDF Advanced

LEGEND

17.08 x 11.30

Participants (26)

Search

- NC Nicole Cabanez (Co-host, me)
- EL Estrella Lucero (Host)
- CF Chris Frey (Co-host, Guest)
- Anna Egas (Co-host)
- 12036059769 (Guest)
- DI Dorreth's iPad (Guest)
- Emilee Gaebler
- GD George DeYoung (Guest)
- Jgsidman (Guest)
- Joshua Huber
- KE Kristen Estabrook (Guest)
- MW Mar wilkinson (Guest)
- MP Mary Pizzuto (Guest)
- MS Max Starke (Guest)

Invite Mute All More

zoom.us Meeting View Edit Window Help Zoom Meeting

Nicole Cabanez

Recording

F2 SITE LO-2 (1).pdf - Nuvo's Power PDF Advanced

LEGEND

17.08 x 11.30

Participants (26)

Search

- MP Mary Pizzuto (Guest)
- MS Max Starke (Guest)
- Michele Miller Sigg (Guest)
- N Nefeli (Guest)
- S Sam A (Guest)
- SA Samuel Andoh (Guest)
- sando (Guest)
- SJ Shancia Jarrett (Guest)
- SM Sheila Martin-Corbin (Guest)
- Thomas Jackson (Guest)
- T Twilliams (Guest)
- VR Victor Rogers (Guest)
- LC Leslie Cole (Guest)
- ycb2 (Guest)

Invite Mute All More

Meeting Minutes

Monday, October 19th

6:00-6:40 pm

<https://yale.zoom.us/j/96237709028>

SLDC: Public Meeting to discuss ABCA

- **Introductions**

- SLDC:
 - Sam Andoh, President
 - Fred Taylor, Vice President
 - Thomas Jackson, Rector
 - Rector Emeritus
- GZA:
 - Chris Frey, Senior Project Manager
- UCONN:
 - Nefeli Bompoti, UCONN Professor and Project Manager of CT Brownfield's Initiative, explains UCONN's role in helping prepare SLDC's application to the grant
 - Jackie Sidman, Teaching Assistant
- Yale Law Community and Economic Development Clinic team under Anika Singh Lemar:
 - Estrella Lucero, Anna Egas, Nicole Cabanez, second-year law students
 - Emilee Gaebler, teaching fellow

- **GZA ABCA Presentation (Chris Frey)**

- Overview of the project and parcels
 - 117-125 Whalley, 129 Walley Avenue
 - GZA conducted Phase I, Phase II and Phase III environmental site assessments, hazardous building materials assessment as well as preparing the Remedial Action Plan and Analysis of Brownfield Clean Up Grant Alternatives (ABCA)
- Phase I investigations of the site
 - Review of available documents, visual walkover of the property
 - Found 9 areas of concern (AOCs) identified on the property, considered potential locations for release of hazardous waste (i.e. underground storage tanks, impacted sites)
- Phase II investigations of the site
 - Conducted to determine whether there were actual releases at the sites identified in Phase I
 - Soil sampling conducted
 - As a result, 2 AOCs were identified where clean-up would be required to meet the state's remediation criteria
- Phase III investigations of the site

- Additional soil investigations of the property to determine the full extent of the areas that required remediation and what concentrations were there, what actions would be needed
 - identified site fill with arsenic and hydrocarbons associated with coal ash fill
- October 2020 Remedial Action Plan
 - Based upon Phase I-III investigations
 - Area that needed to be excavated or removed, and possibility of additional site fill that could be subject to further clean up
 - RAP proposed additional soil warnings after the buildings were removed
- Assessment of Brownfield Clean Up Alternatives (ABCA)
 - Based upon Phase I-III investigations
 - Under ABCA, 4 alternatives considered (all assumed that the buildings would be demolished)
 - **1) No action** (required by the EPA), leaving the impacted materials
 - Would require no cost, so no cost-estimate provided in the ABCA
 - Would not protect from exposure and mitigate risk, so was **rejected**
 - **2) Excavation and off-site disposal of polluted soils**
 - Includes excavation, loading, transportation and off-site disposal of contaminated soils
 - **3) Environmental Land Use Restriction**, allowing soils to remain on the property with certain land-use restrictions to limit risk
 - Leave polluted soils in place beneath caps and record a land use restriction
 - If soils exceed state criteria, would also need to be excavated
 - Cheaper than 2 or 3, **but not as effective at mitigating risk and would hinder future work at the site**, also require special provisions for handling of the soils, exposure to workers
 - So could see additional costs under this alternative that are not included in this assessment
 - **4) Combination of 3 and 4 (excavation and environmental land use restrictions)**
 - Excavation of less severely impacted fill materials, relocation of those soils below the buildings and paved materials
 - Would reduce the area restricted for future work
 - **More costly than the other two alternatives assessed**
 - GZA believes that working closely with the site developer could result in reduced cost, bringing it to less than alternative 3

- **Recommended alternative**
 - GZA's recommends Alternative 4
- **Grant Overview** (Nefeli Bompoti)
 - Site is polluted and undeveloped, after clean-up, development will include various community elements
 - Affordable housing
 - Mixed-use space
 - This is about requesting funds from the EPA for the remediation of the project (cleaning up the soils, hazardous materials, etc.), **funds for the redevelopment is another matter entirely**
 - Emphasizes high value placed on community's input, draft proposal is available to the public during the meeting
- **Q&A:**
 - **Thomas Jackson**, Rector for SLDC: Voices SLDC's strong support for this project. Project is a wonderful way to leverage EPA funds to meet affordable housing need through this mixed-use project.
 - **Yvette Barnard (203) 605-9769:**
 - Asks about the deadline for submitting comments on the draft proposal.
 - Nefeli: Asks for email address to send draft.
 - Asks about the timeline on the project. Is it a 3, 10-year project?
 - Nefeli: If selected for the grant, SLDC will be notified in April 2021 and receipt of funds in October 2021. Funds come with a 3-year window for spending on remediation. Then the development phase would begin.
 - Sam: If the remediation takes 2-3 years, add on another 2-3 years for development so 5-6 years total.
 - **Mar Wilkinson** (via chat): What are the estimated costs for alternative 4?
 - Chris: \$378,000-\$445,000 although GZA believes that the flexibility of this option makes cost-saving opportunities possible, so could end up being the cheapest option of the 3 and wouldn't restrict the property as alternative 2 would

Re: List of attendees at the 10/19/2020 Public Meeting re: ABCA for EPA Grant

List of attendees below. Names were confirmed with Sam Andoh. Screenshots of the Zoom call included for additional reference.

Note:

- Names in parenthesis indicate the screen name used during the zoom call.
- * = individuals who were physically together in a room during the public meeting

1. Mary Pizzuto
2. Max Starke
3. Michele Miller Sigg
4. Nefeli Bompoti
5. Samuel K. Andoh, Sr.*
6. Samuel K. Andoh, Jr.
7. Sharon A. Andoh
8. Shancia Jarrett
9. Sheila Martin-Corbin
10. Thomas Jackson
11. Terry Williams (Twilliams)
12. Victor Rogers
13. Leslie Cole
14. Nicole Cabanez
15. Estrella Lucero
16. Chris Frey
17. Anna Egas
18. Yvette Barnard (1-203-605-9769/ycb2)
19. Dorreth Cole (dorreth's ipad)
20. Emilee Gaebler
21. George DeYounge
22. Jaclyn Sidman (JGSidman)
23. Joshua Huber
24. Kristen Estabrook
25. Mar Wilkinson
26. Mr. William Spruill Jr.*
27. Mr. Frederick Taylor*

Bompoti, Nefeli

From: Estrella Lucero <estrella.lucero@ylsclinics.org>
Sent: Wednesday, October 21, 2020 3:37 PM
To: Andoh, Samuel K.
Cc: Bompoti, Nefeli; Fred Taylor; twilliams000@snet.net; Anika Singh Lemar; Emilee Gaebler; Nicole Cabanez; Anna Egas
Subject: Re: SLDC Monthly Board Meeting cum Community Meeting for EPA Grant Proposal

Message sent from a system outside of UConn.

Sam,

Great to see you this afternoon. Thank you for forwarding the supportive comments.

Thank you also for looping in Nefeli! I believe her team knows how best to incorporate community comments into the application if possible.

Best,
Estrella

From: Andoh, Samuel K. <andohs1@southernct.edu>
Date: Monday, October 19, 2020 at 10:25 PM
To: Estrella Lucero <estrella.lucero@ylsclinics.org>
Cc: Nefeli Bompoti <nefeli.bompoti@uconn.edu>, Fred Taylor <fmt7909@gmail.com>, twilliams000@snet.net <twilliams000@snet.net>
Subject: FW: SLDC Monthly Board Meeting cum Community Meeting for EPA Grant Proposal

Dear Estrella,

The messaged below came from Don and Toni who live not too far from the area. I hope it helps.

From: Walker, Donald E <DWalker@gwcc.commnet.edu>
Sent: Monday, October 19, 2020 1:37 PM
To: Andoh, Samuel K. <andohs1@southernct.edu>
Subject: Re: SLDC Monthly Board Meeting cum Community Meeting for EPA Grant Proposal

Dr Andoh,

Unfortunately, we will not be able to attend tonight's meeting. However, we wanted to express our support for the Application to the Environmental Protection Agency's Brownfield Clean Up Grant, including the Analysis of Brownfield Grant Alternatives (ABCA), specifically to address the receipt of funding to conduct environmental remediation for the parcels of land at 117-125 and 129 Whalley Avenue, New Haven, Connecticut.

Thank you

Donald Walker

Donald Walker

SLDC Board member

Toni Walker

Toni Walker

State Representative 93 District

From: Andoh, Samuel K. <andohs1@southernct.edu>

Sent: Wednesday, October 14, 2020 5:46 PM

To: cdickerson58@gmail.com <cdickerson58@gmail.com>; dhuck21@me.com <dhuck21@me.com>; dorrethcole@comcast.net <dorrethcole@comcast.net>; Eldridge, Robert M. <eldridger1@southernct.edu>; fmt7909@gmail.com <fmt7909@gmail.com>; tcjackson@gmail.com <tcjackson@gmail.com>; wilks51@yahoo.com <wilks51@yahoo.com>; slchurch1844@snet.net <slchurch1844@snet.net>; Walker, Donald E <DWalker@gwcc.commnet.edu>; twilliams000@snet.net <twilliams000@snet.net>; spruillwilliam495@gmail.com <spruillwilliam495@gmail.com>

Cc: anika.lemar@ylsclinics.org <anika.lemar@ylsclinics.org>; nicole.cabanez@ylsclinics.org <nicole.cabanez@ylsclinics.org>; estrella.lucero@ylsclinics.org <estrella.lucero@ylsclinics.org>; anna.egas@ylsclinics.org <anna.egas@ylsclinics.org>; emilee.gaebler@YLSclinics.org <emilee.gaebler@YLSclinics.org>

Subject: RE: SLDC Monthly Board Meeting cum Community Meeting for EPA Grant Proposal

Dear Board Members,

In lieu of our monthly meeting, we are inviting you to a Community Meeting as part of the preparation of the UCONN EPA grant proposal. The community meeting is a requirement of the proposals and so we strongly encourage you to attend. You can invite anybody especially if they live in the neighborhood.

Public Meeting Logistics

- **October 19th @ 6pm**
- **Zoom link:** <https://yale.zoom.us/j/96237709028>
 - We have enabled a waiting room and will be able to use this as a space to remove unruly participants if it appears that the public meeting is being “zoom bombed.” However, we feel the risk of this actually happening is low.
 - **Sam, Fred:** feel free to share this link with your listservs and with interested parishioners

Preliminary Meeting Agenda

- 6:00 – 6:02: Allow participants to join, connect to audio, etc.
- 6:02 – 6:05: Introductions
 - SLDC
 - GZA
 - UCONN
 - CED
- 6:05 – 6:20: GZA explains the ABCA
- 6:20 – ____: Open discussion for questions and feedback from community members.
 - Nefeli and GZA to respond to any technical questions

As we all know, hosting the public meeting is a component of the EPA grant application. However, there is no requirement as to the number of participants who need to attend. It is possible attendance will be minimal, and that is still ok for the purposes of the grant application. If there are no community participants, we will wrap up the meeting early.

THRESHOLD CRITERIA - ATTACHMENT E
St. Luke's Development Corporation
Hardship Waiver Request

Hardship Waiver Request

The nonprofit organization of Saint Luke's Development Corporation requests a waiver of the requirement to contribute 20 percent of the total cost of the cleanup funds required for the Sites in New Haven, Connecticut. The waiver is requested for the following reasons:

- SLDC is a nonprofit organization founded in New Haven, Connecticut 20 years ago around St. Luke's Episcopal Church to develop the surrounding area with attractive and affordable housing. The organization operates through donations, funding from the church and other nonprofit organizations, and by aiding the community with community work like clothing drives and soup kitchens. The funds from this grant would go directly into the community of New Haven to help the wellbeing of the people, as that is the mission of the organization from the start.
- Municipal and local funding is limited for the City of New Haven. The median household income of the town is \$41,142, and the census tract of the Sites is even lower at \$36,813.¹ Not only is the average income of the area lower than the rest of the state's median of \$76,106, but 30% of the census tract population is impoverished in New Haven.^{1,2} Not only is there no funding directly from the community, but the City of New Haven has a town deficit exceeding 2.7% of total revenue.³ SLDC and the town do not have the funding capabilities to fund the cleanup of these sites.
- Unemployment of the target area is extremely high, with over 20% of the population unemployed.¹ This is much higher than the City average of 5.1% unemployment, which is still significantly higher than the state unemployment rate of 4.1%.¹ This staggering difference in unemployment, of 5 times the state average for the target area, indicates how disadvantaged the community of this neighborhood is.
- The target area in New Haven has also seen a decline in population of 4.4% when compared to 2009-2013, while the country as a whole has seen a population increase of 3.6%.⁴ This means that while the country as a whole has seen increases in population, New Haven and specifically our target area, have been suffering population loss and therefore economic loss while the rest of the country increased.
- There is also quite a large percent of residents in New Haven collecting SNAP benefits. Around 26% of the households in this City are collecting these benefits.⁴ Almost 30% of families and households in this town are so burdened financially that they struggle to adequately feed their families without aid. With families struggling to feed their children in this City, there is no extra available funding to help fund this project. It creates a vicious cycle, where the remediation and redevelopment of these Sites would help alleviate financial strain on the community, but the community currently does not have the funds to begin such a project.
- The census tract of our target sites has only 6.5% of the population with a Bachelor's degree, where the state and country has more than 3 times that (21.7% and 19.4% respectively).⁴ This limits the type of work and the amount of income our area's residents can earn. Around 16.6% of the population in our target area has less than a high school education, compared to the state, which has only 9.5%.⁴ Again, this limits the jobs and financially opportunities available for our target area, putting our community at a greater disadvantage than the rest of the state.

¹US Census (<https://www.ctdata.org/>)

²EJSCREEN

³New Haven Town Profile (<https://www.ctdata.org/>)

⁴2018 American Community Survey (US Census Bureau)

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

10/27/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

BF

State Use Only:

6. Date Received by State:

7. State Application Identifier:

CT

8. APPLICANT INFORMATION:

* a. Legal Name: St. Luke's Development Corporation

* b. Employer/Taxpayer Identification Number (EIN/TIN):

061509394

* c. Organizational DUNS:

1490469190000

d. Address:

* Street1: 111 Whalley Avenue

Street2:

* City: New Haven

County/Parish: New Haven

* State: CT: Connecticut

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 06511-3220

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Dr.

* First Name:

Samuel

Middle Name:

K

* Last Name:

Andoh

Suffix:

Title: President

Organizational Affiliation:

ST. Luke's Development Corporation

* Telephone Number: 20376407858

Fax Number:

* Email: andohk10@gmail.com

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-20-07

* Title:

FY21 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

St. Luke's Development Corporation Cleanup Grant: Remediate properties owned at 117 and 129 Whalley Avenue, New Haven, CT

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="500,000.00"/>
* b. Applicant	<input type="text" value="100,000.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="600,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: